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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)	MDL No. 2804
PRESCRIPTION OPIATE)	
LITIGATION)	Case No.
)	1:17-MD-2804
)	
THIS DOCUMENT RELATES TO)	Hon. Dan A. Polster
ALL CASES)	
)	

— — —

Thursday, February 14, 2019

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CONFIDENTIALITY REVIEW

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Videotaped Deposition of BILL BRANDT,
held at Locke Lord LLP, 2200 Ross Avenue,
Suite 2800, Dallas, Texas, commencing at
9:07 a.m., on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Registered Diplomate
Reporter, Certified Realtime Reporter and
Notary Public.

— — —

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<p>1 APPEARANCES:</p> <p>2 JONES DAY</p> <p>3 BY: CASTEEL E. BORSAY, ESQUIRE</p> <p>4 cborsay@jonesday.com</p> <p>5 (via teleconference)</p> <p>6 325 John H. McConnell Boulevard</p> <p>7 Suite 600</p> <p>8 Columbus, Ohio 43215-2673</p> <p>9 (614) 469-3939</p> <p>10 Counsel for Walmart Corporation</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 DEPOSITION EXHIBITS</p> <p>2 BILL BRANDT</p> <p>3 February 14, 2019</p> <p>4 HENRY SCHEIN, INC.-BRANDT EXHIBITS PAGE</p> <p>5 Exhibit 1 Verifications Department 37</p> <p>6 Profile, Melville and Reno</p> <p>7 HSI-MDL-00022669 - 670</p> <p>8</p> <p>9 Exhibit 2 HSI Verification Procedures 86</p> <p>10 for Controlled Drug Orders</p> <p>11 issued February 5, 1998</p> <p>12 HSI-MDL-00404226 - 228</p> <p>13</p> <p>14 Exhibit 3 Controlled Substance 101</p> <p>15 Monitoring Procedure Issued</p> <p>16 December 3, 2012</p> <p>17 HSI-MDL-00000194 - 204</p> <p>18 Exhibit 4 DEA Know Your Customer Due 120</p> <p>19 Diligence Procedure,</p> <p>20 Revised March 31, 2016,</p> <p>21 Rev. 1</p> <p>22 HSI-MDL-00000184 - 193</p> <p>23 Exhibit 5 Bill Brandt LinkedIn 134</p> <p>24 Profile Printout</p> <p>25</p>

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<p>1 deposition taken before?</p> <p>2 A. No.</p> <p>3 Q. Okay. Let me walk you</p> <p>4 through -- I'm sure your counsel told you a</p> <p>5 little bit about what's going to happen.</p> <p>6 I'll tell you a little bit as well.</p> <p>7 A. Okay.</p> <p>8 Q. So we are here. As you can</p> <p>9 see, there's a court reporter next to you,</p> <p>10 and a videographer. The court reporter, I</p> <p>11 think, is probably the most talented person</p> <p>12 in the room, because he will take down</p> <p>13 everything that's said. But as talented as</p> <p>14 he is, he cannot transcribe verbal -- or</p> <p>15 nonverbal actions.</p> <p>16 A. Okay.</p> <p>17 Q. So I'll be asking questions.</p> <p>18 Hopefully you'll be giving answers. I'd ask</p> <p>19 that you answer each question with a yes or a</p> <p>20 no and try to avoid uh-huhs or huh-uhs or</p> <p>21 shrugs or shakes of the head.</p> <p>22 A. Okay.</p> <p>23 Q. Also, he cannot transcribe when</p> <p>24 we speak over each other. He can only catch</p> <p>25 one person at a time. So even though it may</p>	<p>1 Q. Okay. We can go ahead and step</p> <p>2 in and get started.</p> <p>3 Would you state your name for</p> <p>4 the record, please?</p> <p>5 A. Bill Brandt.</p> <p>6 Q. How do you spell your last</p> <p>7 name?</p> <p>8 A. B-R-A-N-D-T.</p> <p>9 Q. And, Mr. Brandt, are you</p> <p>10 currently employed?</p> <p>11 A. Yes.</p> <p>12 Q. Where?</p> <p>13 A. Henry Schein.</p> <p>14 Q. And when did you start with</p> <p>15 Henry Schein?</p> <p>16 A. October 1992.</p> <p>17 Q. Prior to becoming employed with</p> <p>18 Henry Schein, did you have a job previous to</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 Q. And what was that?</p> <p>22 A. JCPenney.</p> <p>23 Q. What was your position at</p> <p>24 JCPenney?</p> <p>25 A. I was an operations supervisor.</p>
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<p>1 be painfully obvious where my question is</p> <p>2 going, I ask that you allow me to finish my</p> <p>3 question before you start your answer.</p> <p>4 A. Okay.</p> <p>5 Q. And I will try to do the same.</p> <p>6 I don't want to cut you off of any of your</p> <p>7 answers, and if I do cut you off, please let</p> <p>8 me know.</p> <p>9 A. Okay.</p> <p>10 Q. I don't know how long we'll go</p> <p>11 today, but we can take a break probably every</p> <p>12 hour, hour and a half. If at any time you</p> <p>13 want to take a break, let me know. We'll try</p> <p>14 to finish up the topic or questioning and</p> <p>15 then we'll go ahead and take a break.</p> <p>16 A. Okay.</p> <p>17 Q. I just ask that we don't take a</p> <p>18 break while a question is pending. I think</p> <p>19 these are the primary ground rules.</p> <p>20 A. Okay.</p> <p>21 Q. Have you taken any substance or</p> <p>22 under the influence of any medication that</p> <p>23 would affect your ability to testify</p> <p>24 truthfully today?</p> <p>25 A. No.</p>	<p>1 Q. For how long were you at</p> <p>2 JCPenney?</p> <p>3 A. I believe it was just shy of</p> <p>4 three years.</p> <p>5 Q. And prior to JCPenney, were you</p> <p>6 employed anywhere?</p> <p>7 A. I was in college.</p> <p>8 Q. Do you have a college degree?</p> <p>9 A. I do.</p> <p>10 Q. From what college?</p> <p>11 A. Chico State University.</p> <p>12 Q. Where is Chico State</p> <p>13 University?</p> <p>14 A. Northern California.</p> <p>15 Q. Is it a bachelor's degree?</p> <p>16 A. Yes.</p> <p>17 Q. Did you have a major?</p> <p>18 A. Psychology.</p> <p>19 Q. Do you have any advanced</p> <p>20 degrees?</p> <p>21 A. No.</p> <p>22 Q. Your job at JCPenney, I assume</p> <p>23 it did not involve the distribution of</p> <p>24 controlled substances; is that correct?</p> <p>25 A. That's correct.</p>

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<p style="text-align: right;">Page 14</p> <p>1 Q. All right. I had to check that 2 box. Thank you. 3 When you started with 4 Henry Schein in October of 1992, what was the 5 first position that you held? 6 A. The first position was 7 inventory control supervisor. 8 Q. And where were you located? 9 A. That was in Reno, Nevada. 10 Q. For how long were you an 11 inventory control supervisor? 12 A. For about a year. 13 Q. And after that year, did you 14 assume another position at Henry Schein? 15 A. At JCPenney or -- 16 Q. I'm sorry. I was talking about 17 Henry Schein. 18 A. Oh, I'm sorry, I apologize. 19 Q. I think -- let me just make 20 sure I've got the timeline right. 21 You said you started as 22 inventory control supervisor at Henry Schein? 23 A. I did. 24 Q. And how long did you hold that 25 position?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes. 2 Q. And after that, what was the 3 next position you held at Henry Schein? 4 A. After that I had an opportunity 5 to go to France and help open a warehouse in 6 a city named Tours, France. 7 Q. So for how long were you in 8 France? 9 A. That was just shy of a year. 10 Q. Well, I hope every position 11 hasn't been one year; otherwise, we might go 12 into lunch. But we'll keep going. 13 A. Okay. 14 Q. After opening the warehouse in 15 France, did you hold another position with 16 Henry Schein? 17 A. I returned to Reno, Nevada as 18 supervisor of -- I believe it was production 19 for a short time. 20 Q. And when you say a short time, 21 is that -- about how long? 22 A. About six months. 23 Q. And after that, what was the 24 next position that you held at Henry Schein? 25 A. I took a transfer to</p>
<p style="text-align: right;">Page 15</p> <p>1 A. I held that position for about 2 a year or so, yeah. 3 Q. And then what was the next 4 position you held at Henry Schein? 5 A. I believe it was in production, 6 picking and packing. 7 Q. And for how long were you in 8 production? 9 A. About a year as well. 10 Q. Was that also in Reno? 11 A. That was in Reno. 12 Q. And when you say Reno, I assume 13 it's Reno, Nevada? 14 A. Yes. Yes. 15 Q. After that, what was the next 16 position you held at Henry Schein? 17 A. I believe for a little under a 18 year, I moved into a shipping supervisor 19 role, shipping and receiving I believe it 20 was. Case pick. 21 Q. And for how long were you in 22 that shipping and receiving role? 23 A. I think that was about a year 24 as well. 25 Q. Also in Reno?</p>	<p style="text-align: right;">Page 17</p> <p>1 Indianapolis, our Indianapolis distribution 2 center. 3 Q. And what did you do at the 4 Indianapolis distribution center? 5 A. I managed a case pick building. 6 Q. What is a case pick building? 7 A. It's a separate building from 8 the main warehouse, and everything in the 9 warehouse is in full vendor cases, so no 10 individual loose pick items. 11 Q. And so for how long were you 12 managing the case pick building in 13 Indianapolis? 14 A. About a year. 15 Q. And then after that? 16 A. Customer service. Back to Reno 17 to start a customer service team in Reno. 18 Q. All right. Let's take a break 19 there. Let's -- because I think there's a 20 bunch of positions that I think I can just 21 ask a few questions about each time and we 22 can move on. 23 A. Okay. 24 Q. As inventory control 25 supervisor, which I believe is your first</p>

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<p>1 position at Henry Schein --</p> <p>2 A. Yes.</p> <p>3 Q. -- who did you report to?</p> <p>4 A. I reported to Ric Spellerberg,</p> <p>5 the director of the facility.</p> <p>6 Q. And what were your</p> <p>7 responsibilities?</p> <p>8 A. To maintain the inventory, to</p> <p>9 check inventory accuracy, to set up the</p> <p>10 inventory. I was -- I was one of the</p> <p>11 first -- first hired there, so it was my job</p> <p>12 to help set up the inventory and make sure</p> <p>13 that it was optimized for, you know,</p> <p>14 production, for picking and that.</p> <p>15 Q. When you say inventory,</p> <p>16 inventory of what?</p> <p>17 A. Inventory of all the products</p> <p>18 that we sell, so -- that were stocked in</p> <p>19 Reno. I don't remember the exact number of</p> <p>20 products, but it's a lot of -- a lot of</p> <p>21 products.</p> <p>22 Q. And that includes prescription</p> <p>23 drugs, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Are there any other products</p>	<p>1 A. Yes, I believe so.</p> <p>2 Q. Were class II controlled</p> <p>3 substances stored somewhere else?</p> <p>4 A. Yes.</p> <p>5 Q. Where were they stored?</p> <p>6 A. Indianapolis.</p> <p>7 Q. So there were no class II</p> <p>8 controlled substances in Reno?</p> <p>9 A. That's right.</p> <p>10 Q. Is that still the case today?</p> <p>11 A. Yes, I believe so.</p> <p>12 Q. Okay. The next position you</p> <p>13 said was something having to do with</p> <p>14 production. Generally what were your job</p> <p>15 responsibilities in that position?</p> <p>16 A. To manage -- to help manage the</p> <p>17 pickers and the packers, people who would</p> <p>18 pick the orders and people who would package</p> <p>19 them up to ship to customers.</p> <p>20 Q. And I assume as inventory --</p> <p>21 going back to inventory control supervisor,</p> <p>22 did you have any responsibility for detecting</p> <p>23 suspicious orders?</p> <p>24 A. No.</p> <p>25 Q. Did you have any responsibility</p>
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<p>1 that were stocked in Reno aside from</p> <p>2 prescription drugs?</p> <p>3 A. Yes, consumable products.</p> <p>4 Q. When you say consumable</p> <p>5 products, what do you mean?</p> <p>6 A. Toothbrushes, cotton balls,</p> <p>7 gloves, cleaning supplies, anything a doctor</p> <p>8 or a dentist might use.</p> <p>9 Q. Okay. So was -- is that just</p> <p>10 dental supplies or supplies for other medical</p> <p>11 as well?</p> <p>12 A. No, it was medical, dental and</p> <p>13 animal health.</p> <p>14 Q. Did you have any responsibility</p> <p>15 as an inventory control supervisor for --</p> <p>16 with respect to controlled substances?</p> <p>17 A. Yes.</p> <p>18 Q. Describe that.</p> <p>19 A. I was in charge of the drug</p> <p>20 cage, so I supervised the drug cage.</p> <p>21 Q. And what is the drug cage?</p> <p>22 A. It's -- the cage is where we</p> <p>23 keep controlled substances. In Reno it was</p> <p>24 class III through V.</p> <p>25 Q. Is that still the case today?</p>	<p>1 for customer due diligence?</p> <p>2 A. No.</p> <p>3 Q. In your role as -- in that role</p> <p>4 in production, to whom did you report?</p> <p>5 A. I believe it was Nora -- I</p> <p>6 can't remember her last name. Nora was the</p> <p>7 manager, ops manager that reported to</p> <p>8 Ric Spellerberg, the director. I forget her</p> <p>9 last name.</p> <p>10 Q. And in production, did you have</p> <p>11 any responsibility for detecting suspicious</p> <p>12 orders?</p> <p>13 A. No.</p> <p>14 Q. Did you have any responsibility</p> <p>15 for conducting customer due diligence?</p> <p>16 A. No.</p> <p>17 Q. The next role you said was</p> <p>18 shipping and receiving?</p> <p>19 A. Uh-huh.</p> <p>20 Q. And what were your</p> <p>21 responsibilities in that role?</p> <p>22 A. Again, to manage a team of</p> <p>23 people who would load trucks, to manage the</p> <p>24 shipping schedule, to assist with the</p> <p>25 receiving and freight coming in.</p>

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<p>1 Q. And did you -- who did you</p> <p>2 report to in that role?</p> <p>3 A. I believe Ric Spellerberg</p> <p>4 still.</p> <p>5 Q. Did you have any responsibility</p> <p>6 with respect to identifying or detecting</p> <p>7 suspicious orders of controlled substances?</p> <p>8 A. No.</p> <p>9 Q. And in that role as -- in</p> <p>10 shipping and receiving, did you have any</p> <p>11 responsibility with respect to conducting</p> <p>12 customer due diligence?</p> <p>13 A. No.</p> <p>14 Q. The next role I have is opening</p> <p>15 the warehouse in France. Who did you report</p> <p>16 to while you were in France?</p> <p>17 A. While in France, Bob Minowitz.</p> <p>18 Q. From France, you came -- you</p> <p>19 came back to Reno?</p> <p>20 A. Yes.</p> <p>21 Q. And the next role I have is</p> <p>22 supervisor of production; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Why did you leave France to</p> <p>25 come back to Reno?</p>	<p>1 Q. And then the next role you said</p> <p>2 was in the Indianapolis distribution center?</p> <p>3 A. That's right.</p> <p>4 Q. So here, if I remember your</p> <p>5 testimony correctly, there are class II</p> <p>6 substances stored in the Indianapolis</p> <p>7 distribution center; is that correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And how were those stored at</p> <p>10 the time in the distribution center?</p> <p>11 A. In a -- I apologize.</p> <p>12 Q. Sure.</p> <p>13 A. In a cement vault.</p> <p>14 Q. Was the vault locked?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. And I wasn't in charge of --</p> <p>18 that wasn't part of my role.</p> <p>19 Q. You read my next question.</p> <p>20 Did you have any responsibility</p> <p>21 with respect to class II controlled</p> <p>22 substances?</p> <p>23 A. No.</p> <p>24 Q. So what were your</p> <p>25 responsibilities during the time at the</p>
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<p>1 A. The assignment was complete. I</p> <p>2 went to set up the -- help set up the</p> <p>3 warehouse and the inventory, so the</p> <p>4 assignment was complete. So I -- naturally I</p> <p>5 came back to Reno, where I lived for a short</p> <p>6 time, and then had an opportunity to transfer</p> <p>7 to Indianapolis.</p> <p>8 Q. All right. As the supervisor</p> <p>9 in production, were your job responsibilities</p> <p>10 generally the same as the production role</p> <p>11 that you had held previously in Reno?</p> <p>12 A. Yes.</p> <p>13 Q. And did you also -- to whom did</p> <p>14 you report during that period there?</p> <p>15 A. I believe it was still</p> <p>16 Ric Spellerberg.</p> <p>17 Q. And did you have any</p> <p>18 responsibilities for identifying or</p> <p>19 investigating suspicious orders of controlled</p> <p>20 substances?</p> <p>21 A. No, not at that time.</p> <p>22 Q. And did you have any</p> <p>23 responsibility for conducting customer due</p> <p>24 diligence?</p> <p>25 A. No.</p>	<p>1 Indianapolis distribution center?</p> <p>2 A. My responsibilities were to</p> <p>3 manage a case pick, vendor case pick</p> <p>4 warehouse that was several miles from the</p> <p>5 main warehouse.</p> <p>6 Q. Was the cement vault that you</p> <p>7 described in the main warehouse or in the</p> <p>8 case pick warehouse?</p> <p>9 A. It was in the main warehouse.</p> <p>10 Q. So it was not in the warehouse</p> <p>11 where you worked?</p> <p>12 A. That's right.</p> <p>13 Q. What types of materials were</p> <p>14 stored in the case pick warehouse that you</p> <p>15 managed?</p> <p>16 A. Cases of gloves, cases of</p> <p>17 towels, cases of drape sheets, some</p> <p>18 equipment, things like that.</p> <p>19 Q. All right. And that I think</p> <p>20 then brings us to where you said you joined</p> <p>21 the Reno customer service team; is that</p> <p>22 correct?</p> <p>23 A. So I actually separated from</p> <p>24 the company for a short time, a couple of</p> <p>25 weeks, drove back to Reno, and the company</p>

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<p>1 contacted me and advised that they had an</p> <p>2 opportunity to -- they wanted to start a</p> <p>3 customer service team in Reno, and they asked</p> <p>4 if I was interested in interviewing for that.</p> <p>5 Q. All right. So when did you</p> <p>6 separate from the company?</p> <p>7 A. I believe it was February</p> <p>8 of '96.</p> <p>9 Q. And why did you separate from</p> <p>10 Henry Schein?</p> <p>11 A. Because my wife and I are both</p> <p>12 from Northern California. My wife was</p> <p>13 pregnant at the time that I took the</p> <p>14 transfer. We had our first son in</p> <p>15 Indianapolis, and we just weren't happy being</p> <p>16 that far away from our family.</p> <p>17 Q. Approximately how long from</p> <p>18 when you left Henry Schein was it until</p> <p>19 someone contacted you about the opportunity</p> <p>20 in Reno?</p> <p>21 A. I believe about two weeks.</p> <p>22 Q. Did you find new employment at</p> <p>23 that time, or during those two weeks?</p> <p>24 A. No, I was looking, but I didn't</p> <p>25 find anything.</p>	<p>1 to me to see if I might have interest in</p> <p>2 starting that team in Reno.</p> <p>3 Q. Had you ever worked in a call</p> <p>4 center before?</p> <p>5 A. No.</p> <p>6 Q. I assume you accepted the</p> <p>7 position?</p> <p>8 A. Yes.</p> <p>9 Q. And so what was your role at</p> <p>10 that time? What was your job title?</p> <p>11 A. Supervisor of customer service.</p> <p>12 Q. Did you have individuals who</p> <p>13 reported to you?</p> <p>14 A. Yes.</p> <p>15 Q. How many?</p> <p>16 A. Five.</p> <p>17 Q. And what were your</p> <p>18 responsibilities as supervisor of customer</p> <p>19 service?</p> <p>20 A. To make sure that we answer the</p> <p>21 phone, to make sure that the team was</p> <p>22 trained, to provide support to the team of</p> <p>23 agents.</p> <p>24 Q. At the time that you joined --</p> <p>25 or you rejoined Henry Schein, was there</p>
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<p>1 Q. So who contacted you about the</p> <p>2 new opportunity at Henry Schein?</p> <p>3 A. Peter Dellacroce.</p> <p>4 Q. And who is Peter Dellacroce?</p> <p>5 A. Peter -- now? His role now or</p> <p>6 then?</p> <p>7 Q. So then, and then we'll go to</p> <p>8 now.</p> <p>9 A. I believe -- at that time I</p> <p>10 believe he was -- I believe he might have</p> <p>11 been the director of customer service.</p> <p>12 Q. And it sounds like he's still</p> <p>13 with Henry Schein today?</p> <p>14 A. Yes.</p> <p>15 Q. And what is his role today?</p> <p>16 A. He's vice president of global</p> <p>17 services.</p> <p>18 Q. When Mr. Dellacroce contacted</p> <p>19 you, what did he say?</p> <p>20 A. He said that they were</p> <p>21 thinking -- they had been thinking about</p> <p>22 opening a call center in Reno. We had worked</p> <p>23 together in the past from an operations</p> <p>24 standpoint because he was also in operations,</p> <p>25 and they were very interested in just talking</p>	<p>1 already a customer service call center</p> <p>2 anywhere?</p> <p>3 A. Yes.</p> <p>4 Q. Where?</p> <p>5 A. In Melville, New York.</p> <p>6 Q. So was this moving the call</p> <p>7 center from Melville to Reno, or did they</p> <p>8 start up a second call center?</p> <p>9 A. They started up a second call</p> <p>10 center.</p> <p>11 Q. So were you involved with</p> <p>12 designing the training materials?</p> <p>13 A. No, not at that time.</p> <p>14 Q. Yeah. And I'm just talking</p> <p>15 about at that -- during this period.</p> <p>16 A. At that period, no. I was</p> <p>17 trained. I got -- I was trained on the</p> <p>18 existing materials.</p> <p>19 Q. The role of supervisor of</p> <p>20 customer service, who at that time were</p> <p>21 Henry Schein's customers?</p> <p>22 MR. JONES: Object to the form.</p> <p>23 MR. ACKERMAN: You can answer.</p> <p>24 So from time to time, Mr. Jones</p> <p>25 may object to a question. You can</p>

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<p style="text-align: right;">Page 30</p> <p>1 answer unless he instructs you not to</p> <p>2 object -- not to answer.</p> <p>3 A. My understanding, dentists,</p> <p>4 doctors, veterinarians.</p> <p>5 BY MR. ACKERMAN:</p> <p>6 Q. For how long were you</p> <p>7 supervisor of customer service?</p> <p>8 A. I believe -- I believe several</p> <p>9 years, maybe two or three years.</p> <p>10 Q. Who did you report to?</p> <p>11 A. Jim Mullins.</p> <p>12 Q. And what was Mr. Mullins' title</p> <p>13 at the time?</p> <p>14 A. At the time Jim was probably</p> <p>15 the manager of customer service.</p> <p>16 Q. Was he located in Reno?</p> <p>17 A. No. Melville, New York.</p> <p>18 Q. Is Mr. Mullins still with the</p> <p>19 company?</p> <p>20 A. Yes.</p> <p>21 Q. And what is his title now?</p> <p>22 A. Senior vice president, global</p> <p>23 services.</p> <p>24 Q. After the two to three years</p> <p>25 you were supervisor of customer service --</p>	<p style="text-align: right;">Page 32</p> <p>1 service representatives reported to you -- or</p> <p>2 let me ask the question differently.</p> <p>3 At that time how many customer</p> <p>4 service representatives did you oversee?</p> <p>5 A. I would -- I would estimate 20.</p> <p>6 Q. Did the customer service</p> <p>7 representatives take orders for Henry Schein?</p> <p>8 A. No.</p> <p>9 Q. The training materials for the</p> <p>10 customer service representatives, did they</p> <p>11 address potential diversion of controlled</p> <p>12 substances?</p> <p>13 A. No.</p> <p>14 Q. Did the training materials</p> <p>15 address due diligence or customer due</p> <p>16 diligence?</p> <p>17 A. In customer service, no.</p> <p>18 Q. And thank you for clarifying.</p> <p>19 Yeah.</p> <p>20 Did the training materials in</p> <p>21 customer service address identification or</p> <p>22 investigation of suspicious orders of</p> <p>23 controlled substances?</p> <p>24 A. No.</p> <p>25 Q. Generally what types of</p>
<p style="text-align: right;">Page 31</p> <p>1 I've lost track of my timeline so I'm not</p> <p>2 going to guess the year, but what was the</p> <p>3 next job you held at Henry Schein?</p> <p>4 A. It was manager of customer</p> <p>5 service. I was promoted.</p> <p>6 Q. Were there additional</p> <p>7 responsibilities that came with that</p> <p>8 promotion?</p> <p>9 A. I think so. A bigger team,</p> <p>10 managing more people, handling more call</p> <p>11 volume.</p> <p>12 Q. As manager -- first of all, how</p> <p>13 long were you manager of customer service?</p> <p>14 A. I believe until 2003. That's</p> <p>15 when I was promoted to director.</p> <p>16 Q. About how long is that? Just</p> <p>17 because I haven't added up the years that</p> <p>18 we've been going through.</p> <p>19 A. I think about four or five</p> <p>20 years, something like that.</p> <p>21 Q. Did you oversee the team, the</p> <p>22 customer service team in Melville, as well as</p> <p>23 manager of customer service?</p> <p>24 A. No, just the Reno team.</p> <p>25 Q. At that time how many customer</p>	<p style="text-align: right;">Page 33</p> <p>1 inquiries were the customer service</p> <p>2 representatives receiving in this time</p> <p>3 period?</p> <p>4 A. Post sales, so things like</p> <p>5 returns, order tracking, billing questions,</p> <p>6 things like that. Anything that would happen</p> <p>7 after a sale was what the team handles.</p> <p>8 Q. Did the training materials for</p> <p>9 customer service representatives address</p> <p>10 reports of abuse of controlled substances?</p> <p>11 MR. JONES: Object to the form.</p> <p>12 A. No, not that I'm aware of.</p> <p>13 BY MR. ACKERMAN:</p> <p>14 Q. Are you aware of customer</p> <p>15 service representatives at this time</p> <p>16 receiving calls or inquiries reporting abuse</p> <p>17 of controlled substances?</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. As manager of customer service,</p> <p>20 who did you report to?</p> <p>21 A. Jim Mullins.</p> <p>22 Q. Did Mr. Mullins have a</p> <p>23 different title at that time?</p> <p>24 A. Probably director of customer</p> <p>25 service. I'm guessing.</p>

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<p>1 Q. You said you held that 2 position, manager of customer service, until 3 about 2003; is that right? 4 A. I believe so. 5 Q. What was the next position at 6 Henry Schein that you held? 7 A. Director of customer service. 8 Q. And for how long were you 9 director of customer service? 10 A. I believe 13 years. 11 Q. So roughly until 2006? 12 MR. JONES: Object to the form. 13 I think it's 2016. 14 MR. ACKERMAN: I'm sorry, thank 15 you, yes. 16 THE WITNESS: Yes. 17 MR. ACKERMAN: It's early for 18 my math. 19 A. Yes, about 2016 or '17 is when 20 I was promoted again. 21 BY MR. ACKERMAN: 22 Q. What were your job 23 responsibilities as director of customer 24 service? 25 A. Director of customer service,</p>	<p>1 responsibility? 2 A. I don't recall exactly the 3 year, but it was sometime in the -- it was 4 sometime in the mid 2000s, I think. 5 Q. And what responsibilities did 6 you assume with respect to suspicious order 7 monitoring at that time? 8 A. I assumed the oversight of the 9 license verifications team in Melville and 10 Reno. 11 Q. What is the license 12 verifications team? 13 A. The license verifications team 14 is the team that checks orders that pend, 15 things that our system deems suspicious. 16 Q. So you used a term there, 17 "orders that pend." What does that mean? 18 A. Orders that pend are orders 19 that are deemed as potentially suspicious 20 that we should review further. 21 Q. And how do those orders get 22 deemed as potentially suspicious? 23 A. Through a -- through a 24 threshold system that's built into our -- 25 into our systems that would flag an order for</p>
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<p>1 the added responsibilities, the increased 2 size of the team, so the team was getting 3 bigger in Reno. And I also took 4 responsibility for the customer service team 5 in Melville, New York. 6 Q. How large did the team get in 7 Reno? 8 A. At that time, maybe 25 or so. 9 Q. The customer service team in 10 Melville, did they handle the same types of 11 inquiries as the team in Reno, or were there 12 different inquiries that were routed to 13 Melville? 14 MR. JONES: Object to form. 15 A. Yes, the same. Customer 16 service, the same. 17 BY MR. ACKERMAN: 18 Q. As director of customer 19 service, did you have any responsibilities 20 related to suspicious order monitoring? 21 A. Not originally, but that did 22 become part. That did become part of my 23 responsibility. 24 Q. When did suspicious order 25 monitoring become part of your</p>	<p>1 unusual size, unusual frequency, unusual 2 pattern. 3 MR. ACKERMAN: Let's mark this 4 as Exhibit 1. 5 (HenrySchein-Brandt Deposition 6 Exhibit 1 marked.) 7 BY MR. ACKERMAN: 8 Q. So, Mr. Brandt, the court 9 reporter has handed you what's been marked as 10 Exhibit 1. 11 A. Uh-huh. 12 Q. Which is a two-page document 13 numbered HSI-MDL_00022669. Take a moment to 14 review this document and let me know if 15 you've seen it before. 16 (Document review.) 17 A. I don't recall seeing it, but I 18 clearly -- I'm sure I did. 19 BY MR. ACKERMAN: 20 Q. Okay. The title of the 21 document is Verifications Department Profile. 22 Is that the license verifications team that 23 you were just discussing? 24 A. That's correct. 25 Q. About midway down the page on</p>

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<p style="text-align: right;">Page 38</p> <p>1 the left-hand side, it says number of TSMs. 2 Do you see that? 3 A. Yes. 4 Q. What does TSM stand for? 5 A. TSM is Team Schein Member. 6 Q. Is that employees who were 7 assigned to the team? 8 A. Yes, yes. 9 Q. And then above that it says 10 number of prompts. What does that mean? 11 A. Prompts would, I believe, refer 12 to phone prompts, so maybe -- I'm 13 speculating, but that could mean phone 14 prompts, 800 numbers coming in possibly. 15 Q. Okay. 16 A. Yeah. 17 Q. Then this first sentence under 18 department scope of responsibility is: The 19 verifications team is responsible for 20 ensuring compliance with all state and 21 federal licensure requirements for the 22 shipment of medical devices, prescription 23 drugs and controlled substances. 24 Is that an accurate description 25 of the responsibilities of the verifications</p>	<p style="text-align: right;">Page 40</p> <p>1 you at that time? 2 A. No. I think -- I mean, I don't 3 remember exactly, no, but it was probably an 4 overview of the department and everything 5 that it -- everything that goes along with 6 it, and I'm sure we had many discussions 7 about that, I would assume. 8 Q. Was there a verifications 9 department in existence at the time that you 10 assumed responsibility? 11 A. Yes. 12 Q. When you assumed responsibility 13 for the verifications department, did you 14 receive any training on state and federal 15 licensure requirements for the shipment of 16 medical devices, prescription drugs and 17 controlled substances? 18 A. Probably the SOP, so whatever 19 the standard operating procedures were at the 20 time, I'm sure I reviewed those; and then 21 conversations with Jim Mullins and with the 22 team. 23 Q. Has that SOP evolved over time? 24 A. Yes. 25 Q. What do you recall about the</p>
<p style="text-align: right;">Page 39</p> <p>1 department at Henry Schein? 2 A. I think -- I think it's an okay 3 description. It's to review orders and to 4 make sure that we as a company stay in 5 compliance, yeah, with regulations. 6 Q. And was that an accurate 7 description from the time that you assumed 8 responsibilities for suspicious order 9 monitoring? 10 A. I believe so, yes. 11 Q. Before you -- the suspicious 12 order monitoring responsibilities were in 13 your bailiwick, before you had those 14 responsibilities, who was responsible for 15 that aspect of Henry Schein's business? 16 A. You know, I don't recall. I 17 don't recall who managed that prior to me. 18 Q. How did you become aware that 19 you were going to be assuming 20 responsibilities with respect to suspicious 21 order monitoring? 22 A. I believe my boss, Jim Mullins, 23 advised that that would be included in my 24 scope. 25 Q. And do you recall what he told</p>	<p style="text-align: right;">Page 41</p> <p>1 version of the SOP that you reviewed at the 2 time that you assumed responsibility for the 3 verifications department? 4 A. I don't remember it exactly, 5 but I'm sure it included how to approach 6 orders that pend, what the process was for 7 the representatives and the things that 8 they -- guidance for them on how they should 9 conduct their due diligence. 10 Q. If you look back at this 11 Exhibit 1, the next sentence under this 12 section, Department Scope of Responsibility, 13 says: In addition, we are required to "know 14 our customer," when shipping controlled 15 substances according to Federal DEA 16 regulations. 17 Do you see that? 18 A. I do. 19 Q. Do you know why the phrase 20 "know our customer" appears in quotation 21 marks? 22 A. Do I know why it's in quotes? 23 I guess because it's a wide -- at the time -- 24 I don't know what the timing was of this 25 particular memo, but at the time I think that</p>

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<p style="text-align: right;">Page 42</p> <p>1 was -- if I wrote this memo, which I may</p> <p>2 have, it was because maybe it wasn't as</p> <p>3 defined. Maybe it wasn't clearly defined at</p> <p>4 that time.</p> <p>5 Q. Is it clearly defined today?</p> <p>6 A. I believe so. I believe we've</p> <p>7 put -- we've worked with our regulatory team</p> <p>8 who really focuses on this type of thing, and</p> <p>9 we've partnered with them as we always do,</p> <p>10 and I believe we have a good process in place</p> <p>11 now for that and a good understanding.</p> <p>12 Q. At the time that you assumed</p> <p>13 responsibility for the verifications</p> <p>14 department, was the verifications department</p> <p>15 responsible for -- was the verifications</p> <p>16 department required to know our customer when</p> <p>17 shipping controlled substances?</p> <p>18 MR. JONES: Object to the form.</p> <p>19 A. Not -- not formally, like we do</p> <p>20 today. I think that has -- that has</p> <p>21 definitely been an evolving requirement from</p> <p>22 the government.</p> <p>23 BY MR. ACKERMAN:</p> <p>24 Q. So when you say not formally,</p> <p>25 was there an informal process in place when</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MR. ACKERMAN:</p> <p>2 Q. Today does Henry Schein use the</p> <p>3 questionnaire?</p> <p>4 A. Yes.</p> <p>5 Q. And how long is the</p> <p>6 questionnaire that is in use today?</p> <p>7 A. I believe about 20 questions.</p> <p>8 Q. In 2014 or approximately 2014,</p> <p>9 when the questionnaire was implemented, how</p> <p>10 many questions were on the questionnaire?</p> <p>11 A. My recollection, a few short of</p> <p>12 what we are today, so maybe 15 or 16</p> <p>13 questions. I think we've added a few over</p> <p>14 the last few years. When I say we, I'm</p> <p>15 referring to regulatory.</p> <p>16 Q. And under what circumstances --</p> <p>17 today, under what circumstances is the</p> <p>18 questionnaire -- I assume the questionnaire</p> <p>19 gets sent out to customers; is that correct?</p> <p>20 A. They can access it online, or</p> <p>21 we can fax it to them, send it to them.</p> <p>22 Q. And so when does a customer</p> <p>23 complete the questionnaire today?</p> <p>24 A. Just when we --</p> <p>25 MR. JONES: Object to the form.</p>
<p style="text-align: right;">Page 43</p> <p>1 you first assumed responsibility for the</p> <p>2 verifications department?</p> <p>3 A. Well, not informal, but we</p> <p>4 didn't have a questionnaire. But we did have</p> <p>5 things. Customers were -- had a segment, a</p> <p>6 market segment and things like that that --</p> <p>7 so we knew what type of practice the doctor</p> <p>8 had, but we didn't have our questionnaire at</p> <p>9 that time when I first started.</p> <p>10 Q. And what is the questionnaire</p> <p>11 that you're referring to?</p> <p>12 A. It's our Know Your Customer</p> <p>13 questionnaire.</p> <p>14 Q. When did the Know Your Customer</p> <p>15 questionnaire get implemented?</p> <p>16 A. I don't recall exactly. I</p> <p>17 would -- I would estimate 2014, around that</p> <p>18 time.</p> <p>19 Q. How long is the questionnaire?</p> <p>20 A. How long? Two pages.</p> <p>21 Q. How many questions are on the</p> <p>22 questionnaire?</p> <p>23 MR. JONES: Object to the form.</p> <p>24 A. I believe around 20 questions.</p> <p>25 ///</p>	<p style="text-align: right;">Page 45</p> <p>1 A. When we send it to them, so...</p> <p>2 BY MR. ACKERMAN:</p> <p>3 Q. And when does it get sent to</p> <p>4 them?</p> <p>5 A. If they're ordering controlled</p> <p>6 substances, normally that would be the first</p> <p>7 flag that would do that.</p> <p>8 Q. So at that time of a first</p> <p>9 order of controlled substances; is that</p> <p>10 correct?</p> <p>11 A. Not always, but depends what</p> <p>12 they're ordering and upon -- you know, we</p> <p>13 would review the account and when we deem --</p> <p>14 when the team deems that it's necessary.</p> <p>15 Q. Are there procedures in place</p> <p>16 today that specify when a questionnaire</p> <p>17 should be sent to a customer?</p> <p>18 A. I believe so.</p> <p>19 Q. Well, since we skipped to</p> <p>20 today, let me ask a couple of questions that</p> <p>21 I haven't asked yet, which is: What is your</p> <p>22 current role at Henry Schein?</p> <p>23 A. My current role, I was just</p> <p>24 promoted to vice president.</p> <p>25 Q. And congratulations.</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. Thank you.</p> <p>2 Q. When was the promotion?</p> <p>3 A. It was announced yesterday,</p> <p>4 actually.</p> <p>5 Q. So prior to that promotion or</p> <p>6 two days ago, what was the role that you held</p> <p>7 at Henry Schein?</p> <p>8 A. Executive director.</p> <p>9 Q. And for how long were you</p> <p>10 executive director?</p> <p>11 A. Just about a year, a little</p> <p>12 over a year.</p> <p>13 Q. What were your responsibilities</p> <p>14 as executive director?</p> <p>15 A. Pretty much the same as</p> <p>16 director, just managing both customer service</p> <p>17 teams, oversight of license verifications</p> <p>18 team, Reno/Melville, and our gatekeeping</p> <p>19 team, Reno/Melville.</p> <p>20 Q. I see. So you were director of</p> <p>21 customer service for a long period, 13 years;</p> <p>22 is that right?</p> <p>23 A. Yes.</p> <p>24 Q. And then you were executive</p> <p>25 director for about a year?</p>	<p style="text-align: right;">Page 48</p> <p>1 operating procedures and through training</p> <p>2 courses with our regulatory team.</p> <p>3 Q. How many training courses with</p> <p>4 the regulatory team do members of the</p> <p>5 verifications department receive?</p> <p>6 MR. JONES: Object to the form.</p> <p>7 A. You know, I don't know the</p> <p>8 exact number, but our manager, the manager of</p> <p>9 the department, now the director, Shaun</p> <p>10 Abreu, attends annual seminars, so DEA</p> <p>11 seminars to stay up with the latest and</p> <p>12 greatest, and we -- like I said, we work with</p> <p>13 our regulatory team, and Shaun and our</p> <p>14 regulatory team partner and, you know, try to</p> <p>15 provide at least one annual training with the</p> <p>16 team. Like I said, we do use our procedures</p> <p>17 to help the team, to help guide the team.</p> <p>18 BY MR. ACKERMAN:</p> <p>19 Q. When you first assumed</p> <p>20 responsibility for the verifications</p> <p>21 department, was there training courses from</p> <p>22 the regulatory team?</p> <p>23 A. I don't recall back then.</p> <p>24 There certainly may have been. I don't think</p> <p>25 there's ever been anything overly formal.</p>
<p style="text-align: right;">Page 47</p> <p>1 A. Uh-huh.</p> <p>2 Q. And as of yesterday, you are</p> <p>3 now vice president?</p> <p>4 A. Yes.</p> <p>5 Q. Understood. Let's keep looking</p> <p>6 at this verifications department profile</p> <p>7 document.</p> <p>8 A. Okay.</p> <p>9 Q. The next -- actually that</p> <p>10 sentence that I just read that said: In</p> <p>11 addition, we are required to know our</p> <p>12 customer when shipping controlled substances</p> <p>13 according to Federal DEA regulations.</p> <p>14 Do you see that?</p> <p>15 A. Uh-huh. Yes.</p> <p>16 Q. Have you received any training</p> <p>17 on the federal DEA regulations referenced in</p> <p>18 that sentence?</p> <p>19 A. Not -- I haven't personally,</p> <p>20 no.</p> <p>21 Q. Have the members of the</p> <p>22 verifications department received training on</p> <p>23 the federal DEA regulations that are</p> <p>24 referenced in that sentence?</p> <p>25 A. Yes, through our standard</p>	<p style="text-align: right;">Page 49</p> <p>1 They may have come out to do a -- a</p> <p>2 PowerPoint presentation or something like</p> <p>3 that, but I don't recall specifically.</p> <p>4 Q. Are the training courses today</p> <p>5 more formal?</p> <p>6 MR. JONES: Object to the form.</p> <p>7 A. No, just PowerPoint training,</p> <p>8 so I would -- I wouldn't say so, no.</p> <p>9 BY MR. ACKERMAN:</p> <p>10 Q. And have you ever attended one</p> <p>11 of those training courses?</p> <p>12 A. I have.</p> <p>13 Q. When?</p> <p>14 A. I attended one probably in the</p> <p>15 late 2000s, maybe 2010. I attended one last</p> <p>16 year. I think those are the two I've sat in</p> <p>17 on.</p> <p>18 Q. I'm sorry, I didn't want to</p> <p>19 interrupt you.</p> <p>20 A. Those are the two I sat in on.</p> <p>21 Q. You did not attend the training</p> <p>22 courses annually; is that correct?</p> <p>23 A. No.</p> <p>24 Q. Are the training courses an</p> <p>25 annual requirement for members of the</p>

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<p style="text-align: right;">Page 50</p> <p>1 verifications department?</p> <p>2 MR. JONES: Object to the form.</p> <p>3 A. No, the courses I'm speaking</p> <p>4 of, no. The company does have some ethics</p> <p>5 and courses like that that go through our</p> <p>6 compliance department that everybody -- that</p> <p>7 most Team Schein members are responsible to</p> <p>8 formally take every year and to update,</p> <p>9 things like ethics and harassment and things</p> <p>10 like that. So I'm not speaking of that.</p> <p>11 I'm speaking of the partnership</p> <p>12 that our team has with the regulatory team</p> <p>13 and information they put together to help --</p> <p>14 to help our verifications reps understand a</p> <p>15 little bit more about the industry and about</p> <p>16 how they should be looking at and conducting</p> <p>17 some of their due diligence.</p> <p>18 BY MR. ACKERMAN:</p> <p>19 Q. Okay. So there are required</p> <p>20 training -- annual required training courses</p> <p>21 for Henry Schein employees; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. But those required annual</p> <p>24 training courses don't include training on</p> <p>25 identification and investigation of</p>	<p style="text-align: right;">Page 52</p> <p>1 A. So harassment, antiharassment,</p> <p>2 ethics. I don't remember all of the topics</p> <p>3 that are included, but those are pretty wide</p> <p>4 topics that usually are about 45 minutes, and</p> <p>5 it's a Corpedia type of training that has a</p> <p>6 test at the end.</p> <p>7 Q. When you say Corpedia, is that</p> <p>8 like an online training?</p> <p>9 A. Yeah, it's a delivery service.</p> <p>10 Q. Okay. If you skip to the next</p> <p>11 page of Exhibit 1, there's a header -- well,</p> <p>12 first, I want to understand what some of the</p> <p>13 acronyms are on the left side of this page at</p> <p>14 the top, so -- or terms, because they're not</p> <p>15 all acronyms.</p> <p>16 The first one says abandonment</p> <p>17 rate. What is that?</p> <p>18 A. Abandonment rate is when a</p> <p>19 customer calls in through our 800 number, and</p> <p>20 we don't pick up the call before they hang</p> <p>21 up.</p> <p>22 Q. So it's an abandoned call?</p> <p>23 A. Yes.</p> <p>24 Q. Understood.</p> <p>25 Quality average? What does</p>
<p style="text-align: right;">Page 51</p> <p>1 suspicious orders; is that right?</p> <p>2 A. I would say so. I think that's</p> <p>3 correct.</p> <p>4 Q. And they don't include training</p> <p>5 on the DEA's Know Your Customer regulations?</p> <p>6 MR. JONES: Object to the form.</p> <p>7 A. Yeah, I don't believe that it</p> <p>8 includes that. It certainly may. Like I</p> <p>9 said, it's usually larger topics like ethics</p> <p>10 and things like that.</p> <p>11 BY MR. ACKERMAN:</p> <p>12 Q. Are you required to --</p> <p>13 A. Yes.</p> <p>14 Q. -- take the annual training</p> <p>15 courses?</p> <p>16 A. Yes.</p> <p>17 Q. And have you taken them for</p> <p>18 this year?</p> <p>19 A. Possibly. I don't recall.</p> <p>20 Q. You took them for last year,</p> <p>21 though, right?</p> <p>22 A. Yes. Yes.</p> <p>23 Q. So what training courses did</p> <p>24 you take last year that were required by</p> <p>25 Henry Schein?</p>	<p style="text-align: right;">Page 53</p> <p>1 that mean?</p> <p>2 A. Yes, we have a quality -- we</p> <p>3 have a quality process. We record phone</p> <p>4 calls, and we score usually between five and</p> <p>5 ten per agent per month, and have our -- we</p> <p>6 have QA people who coach and who score the</p> <p>7 calls. We have an evaluation sheet and they</p> <p>8 basically provide a final score for the call.</p> <p>9 Q. What metrics are used to score</p> <p>10 the agent's performance?</p> <p>11 A. An evaluation sheet that has</p> <p>12 some of the key -- you know, how they</p> <p>13 answered the phone, phone etiquette, how well</p> <p>14 they solved the problem for the customer.</p> <p>15 It's around those types of things.</p> <p>16 Q. Are these written down</p> <p>17 somewhere?</p> <p>18 A. Yes.</p> <p>19 MR. ACKERMAN: I don't know,</p> <p>20 Scott, whether that's been produced or</p> <p>21 not, but if it hasn't been, we'd ask</p> <p>22 for that production.</p> <p>23 MR. JONES: We'll look at that.</p> <p>24 MR. ACKERMAN: Thank you.</p> <p>25 ///</p>

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<p style="text-align: right;">Page 54</p> <p>1 BY MR. ACKERMAN:</p> <p>2 Q. The next heading says HA Pends.</p> <p>3 What does that mean?</p> <p>4 A. HA Pends refers to orders that</p> <p>5 pend due to state licensing.</p> <p>6 Q. HA, does that -- is that short</p> <p>7 for something?</p> <p>8 A. I don't think so. I don't know</p> <p>9 what the -- it's a pend code. It's just a</p> <p>10 code.</p> <p>11 Q. I see. So there are three</p> <p>12 headings here, right? It says HA Pends, HS</p> <p>13 Pends and HK Pends?</p> <p>14 A. Uh-huh.</p> <p>15 Q. What's the difference between</p> <p>16 HA Pends, HS Pends and HK Pends?</p> <p>17 A. I believe HA refers to state</p> <p>18 licensing, and HS refers to more of the</p> <p>19 controls in suspicious order monitoring.</p> <p>20 Q. And then HK?</p> <p>21 A. HK I believe is -- HK might be</p> <p>22 like a first time order. I'm not exactly</p> <p>23 sure, to be honest with you.</p> <p>24 Q. So do I understand it correctly</p> <p>25 that these letters refer to different reasons</p>	<p style="text-align: right;">Page 56</p> <p>1 roughly 2014 based on this document, on that</p> <p>2 heading.</p> <p>3 A. Uh-huh.</p> <p>4 Q. Once the questionnaire was</p> <p>5 faxed to the customer and the customer faxes</p> <p>6 back or returns the questionnaire to</p> <p>7 Henry Schein in some form or manner, what's</p> <p>8 the next step in the verification process?</p> <p>9 A. The next step is for the form</p> <p>10 to be reviewed.</p> <p>11 Q. And who reviews the form?</p> <p>12 A. We have -- we have people on</p> <p>13 the verifications team that are reviewers</p> <p>14 that are in that role.</p> <p>15 Q. How many?</p> <p>16 A. Today, I don't know the exact</p> <p>17 number. I think we might have between five</p> <p>18 and ten, somewhere in that range.</p> <p>19 Q. How many in 2014?</p> <p>20 A. I don't know, probably between</p> <p>21 three and six. It was probably lower than it</p> <p>22 is today.</p> <p>23 Q. And are there written</p> <p>24 guidelines for that review of the</p> <p>25 questionnaire?</p>
<p style="text-align: right;">Page 55</p> <p>1 for why an order might pend?</p> <p>2 A. Yeah. They're pend codes, so</p> <p>3 yes, I believe so.</p> <p>4 Q. The next heading says:</p> <p>5 Customer facing projects for 2014, and then</p> <p>6 underneath it says: Develop an online tool</p> <p>7 for Know Your Customer, currently faxing the</p> <p>8 information to them. The online version will</p> <p>9 provide an improved customer experience and</p> <p>10 minimize the number of incorrect responses.</p> <p>11 What is that referring to?</p> <p>12 A. So that refers to when we used</p> <p>13 to fax -- and we still do to this day. We do</p> <p>14 some of these -- when we fax a form to a</p> <p>15 customer, sometimes customers don't fill it</p> <p>16 out completely, so the online -- the idea</p> <p>17 with the online form is that we would make</p> <p>18 all of the -- all of the boxes mandatory so</p> <p>19 that they couldn't submit an incomplete form.</p> <p>20 Q. And when you're talking about a</p> <p>21 form, is that the questionnaire that you were</p> <p>22 describing earlier?</p> <p>23 A. Yes.</p> <p>24 Q. So once -- let's talk about</p> <p>25 this time period, which I'm guessing is</p>	<p style="text-align: right;">Page 57</p> <p>1 A. Just there's -- I believe</p> <p>2 there's a work instruction.</p> <p>3 Q. When you say a work</p> <p>4 instruction, is that -- is that a type of</p> <p>5 document at Henry Schein?</p> <p>6 A. Yeah, like a training guide or</p> <p>7 something like that.</p> <p>8 Q. Do you know what that might be</p> <p>9 called or titled?</p> <p>10 A. I don't.</p> <p>11 Q. If you were looking to get a</p> <p>12 copy of it, how would you get a copy?</p> <p>13 A. I would ask -- I would ask the</p> <p>14 regulatory department or I would ask Shaun</p> <p>15 Abreu.</p> <p>16 Q. Did you draft that work</p> <p>17 instruction?</p> <p>18 A. Did I?</p> <p>19 Q. Yes.</p> <p>20 A. No. I don't believe so.</p> <p>21 Q. Have you reviewed that work</p> <p>22 instruction?</p> <p>23 A. Yeah, I believe I've seen it</p> <p>24 before. I've reviewed it. I don't -- I</p> <p>25 wouldn't pretend to be an expert on it or</p>

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<p style="text-align: right;">Page 58</p> <p>1 anything like that.</p> <p>2 Q. Did you have any input to -- or</p> <p>3 did you suggest any changes to the work</p> <p>4 instruction when you reviewed it?</p> <p>5 A. Not that I -- not that I</p> <p>6 recall. I mean, it's possible I may have</p> <p>7 over the years if something stood out to me</p> <p>8 or if something was brought to my attention</p> <p>9 that was -- that needed to be changed, I</p> <p>10 certainly may have, but I don't recall</p> <p>11 anything specific.</p> <p>12 Q. Do you know who drafted the</p> <p>13 work instruction?</p> <p>14 A. My -- I would -- I would assume</p> <p>15 regulatory. I would assume -- I shouldn't be</p> <p>16 saying assume, but I think Shaun Abreu</p> <p>17 probably had a hand in that.</p> <p>18 Q. And understanding you're</p> <p>19 assuming, but that assumption is based on</p> <p>20 your almost 30 years of experience at</p> <p>21 Henry Schein; is that right?</p> <p>22 MR. JONES: Object to the form.</p> <p>23 BY MR. ACKERMAN:</p> <p>24 Q. What's the basis for your</p> <p>25 assumption?</p>	<p style="text-align: right;">Page 60</p> <p>1 we're all sharing and collaborating and</p> <p>2 making sure that we're sharing.</p> <p>3 So that -- it doesn't ring a</p> <p>4 bell, to be honest with you, but...</p> <p>5 Q. And you sort of anticipated my</p> <p>6 next question, which was what best practice</p> <p>7 sharing means. But is there -- sharing with</p> <p>8 whom?</p> <p>9 A. Each other. It could be a</p> <p>10 manager to a manager. It could be</p> <p>11 supervisors. It could be -- it could be</p> <p>12 other Team Schein members, so...</p> <p>13 MR. JONES: If you get to a</p> <p>14 transition point, can we take a short</p> <p>15 break?</p> <p>16 MR. ACKERMAN: I was about to</p> <p>17 say I think it's a good point for a</p> <p>18 short break, yeah.</p> <p>19 THE WITNESS: Sure.</p> <p>20 THE VIDEOGRAPHER: The time is</p> <p>21 now 10:08. Going off the record.</p> <p>22 (Recess taken, 10:08?a.m. to</p> <p>23 10:30?a.m.)</p> <p>24 THE VIDEOGRAPHER: Time is now</p> <p>25 10:30. Back on the record.</p>
<p style="text-align: right;">Page 59</p> <p>1 A. Yeah, well, because I -- I</p> <p>2 haven't been in this role for as long, of</p> <p>3 course. Regulatory is really responsible for</p> <p>4 helping to shape the rules, so to speak, the</p> <p>5 guidelines, and the verifications team is</p> <p>6 really responsible for enforcement.</p> <p>7 So I don't think anything would</p> <p>8 ever be created by our team without --</p> <p>9 without the regulatory team being the ones to</p> <p>10 initiate it or, you know, to review it and</p> <p>11 approve it.</p> <p>12 BY MR. ACKERMAN:</p> <p>13 Q. All right. The next heading on</p> <p>14 this document says Best Practice Sharing.</p> <p>15 Do you see that?</p> <p>16 A. Uh-huh.</p> <p>17 Q. And then it says to share</p> <p>18 verifications tip sheet?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Does that term ring a bell,</p> <p>21 "verifications tip sheet"?</p> <p>22 A. It doesn't. It doesn't. Best</p> <p>23 practice sharing is something -- it's a</p> <p>24 company philosophy. We do that throughout</p> <p>25 the organization, just to make sure that</p>	<p style="text-align: right;">Page 61</p> <p>1 BY MR. ACKERMAN:</p> <p>2 Q. Thank you, Mr. Brandt.</p> <p>3 A. Sure.</p> <p>4 Q. I want to ask you a couple more</p> <p>5 questions about the verifications department.</p> <p>6 So if you look back at the first page of</p> <p>7 Exhibit 1, it shows that there are 18</p> <p>8 representatives in Melville, nine</p> <p>9 representatives in Reno, or at least there</p> <p>10 were at the time of this document. I don't</p> <p>11 know what the numbers are today.</p> <p>12 But is there any difference in</p> <p>13 the job responsibilities between the</p> <p>14 representatives in Melville and the</p> <p>15 representatives in Reno?</p> <p>16 MR. JONES: Object to the form.</p> <p>17 A. I don't know. I don't know. I</p> <p>18 don't believe so. I don't know.</p> <p>19 BY MR. ACKERMAN:</p> <p>20 Q. Okay. At the time you were</p> <p>21 overseeing -- at the time of this document,</p> <p>22 which is around 2014, you were overseeing</p> <p>23 both the Melville team and the Reno team; is</p> <p>24 that correct?</p> <p>25 A. I believe so. I'm not a</p>

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<p style="text-align: right;">Page 62</p> <p>1 hundred percent sure on that, but I believe</p> <p>2 so.</p> <p>3 Q. And why aren't -- is there --</p> <p>4 what causes you not to be a hundred percent</p> <p>5 sure?</p> <p>6 A. That I was over -- I'm not</p> <p>7 exactly sure when I took responsibility for</p> <p>8 the -- when I was granted the oversight of</p> <p>9 that, of the team. Is that what you're</p> <p>10 asking me? I'm not sure I understand your</p> <p>11 question.</p> <p>12 Q. Yeah, sure. So going back to</p> <p>13 this verifications department profile</p> <p>14 document.</p> <p>15 A. Uh-huh.</p> <p>16 Q. It listed as -- the manager is</p> <p>17 Shaun Abreu. Do you see that?</p> <p>18 A. Uh-huh.</p> <p>19 Q. And then the director has your</p> <p>20 name; is that correct?</p> <p>21 A. Yes.</p> <p>22 Q. And is it correct at this time</p> <p>23 that Shaun Abreu reported to you?</p> <p>24 A. Yes.</p> <p>25 Q. So at the time of this</p>	<p style="text-align: right;">Page 64</p> <p>1 verifications department team?</p> <p>2 A. Not to my knowledge. Not to</p> <p>3 my -- not that I...</p> <p>4 Q. When you say not to your</p> <p>5 knowledge, does that mean that both the</p> <p>6 Melville team and the Reno team were doing</p> <p>7 the same thing --</p> <p>8 MR. JONES: Object to the form.</p> <p>9 BY MR. ACKERMAN:</p> <p>10 Q. -- to your knowledge?</p> <p>11 A. I wouldn't say that</p> <p>12 necessarily. I just don't know that they</p> <p>13 were doing the same -- if they were doing the</p> <p>14 same thing.</p> <p>15 Q. Did the Melville verifications</p> <p>16 department team have responsibility for</p> <p>17 activities relating to orders of class II</p> <p>18 controlled substances?</p> <p>19 MR. JONES: Object to the form.</p> <p>20 A. I'm not sure I understand the</p> <p>21 question.</p> <p>22 BY MR. ACKERMAN:</p> <p>23 Q. Sure.</p> <p>24 At the time of this document --</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 63</p> <p>1 document, who was overseeing the Melville</p> <p>2 verifications department team?</p> <p>3 A. Shaun.</p> <p>4 Q. And who was overseeing the Reno</p> <p>5 verifications department team?</p> <p>6 A. Shaun, I believe. I believe</p> <p>7 Shaun had responsibility for both.</p> <p>8 Q. And then you were overseeing</p> <p>9 Shaun?</p> <p>10 A. Correct.</p> <p>11 Q. Thank you.</p> <p>12 To your knowledge, was there</p> <p>13 any difference in the responsibilities</p> <p>14 assigned to the Melville verifications</p> <p>15 department team at the time of this document</p> <p>16 from the responsibilities assigned to the</p> <p>17 Reno verifications department team?</p> <p>18 A. I don't know. Going back to</p> <p>19 that year, I don't know.</p> <p>20 Q. Okay. At any point in your</p> <p>21 tenure overseeing the verifications</p> <p>22 department, has there been any distinction</p> <p>23 between the responsibilities assigned to the</p> <p>24 Melville verifications department team and</p> <p>25 the responsibilities assigned to the Reno</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. -- roughly 2014 --</p> <p>2 A. Right.</p> <p>3 Q. -- it says: The verifications</p> <p>4 team is responsible for ensuring compliance</p> <p>5 with all state and federal licensure</p> <p>6 requirements, correct?</p> <p>7 A. Correct.</p> <p>8 Q. Did the Melville -- the members</p> <p>9 of the team who were assigned to Melville</p> <p>10 have responsibility for ensuring compliance</p> <p>11 with all state and federal licensure</p> <p>12 regulations -- I'm sorry, state and federal</p> <p>13 licensure requirements for class II</p> <p>14 controlled substances?</p> <p>15 A. Yes, I believe so.</p> <p>16 Q. Did the -- at the time of this</p> <p>17 document, the Reno verifications department</p> <p>18 team have responsibility for ensuring</p> <p>19 compliance with all state and federal</p> <p>20 licensure requirements with respect to</p> <p>21 class II controlled substances?</p> <p>22 A. Yes.</p> <p>23 Q. Has there ever -- during your</p> <p>24 tenure has there ever been a point in time</p> <p>25 during which either the Melville</p>

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<p style="text-align: right;">Page 66</p> <p>1 verifications department team or the Reno 2 verifications department team did not have 3 responsibility for ensuring compliance with 4 all state and federal licensure requirements 5 with respect to class II controlled 6 substances? 7 A. I don't know. I don't know. 8 Are you asking during my oversight of the 9 department? 10 Q. Correct. 11 A. Then -- so can you ask it 12 again. 13 Q. Sure. 14 A. I'm sorry, I just don't want to 15 make a mistake here. 16 Q. No, that's fair. 17 A. Okay. 18 Q. During your oversight of the 19 department -- 20 A. Okay. 21 Q. -- which -- let me just 22 establish this. 23 I believe based on prior 24 testimony, your oversight of the department 25 is approximately a 15-year period; is that</p>	<p style="text-align: right;">Page 68</p> <p>1 change at the time you were promoted from 2 director of customer service to executive 3 director? 4 A. Not -- not -- no, not much. 5 Q. When you say not much, was 6 there any change? 7 A. Nothing I can think of here, 8 yeah. 9 Q. And then you went from 10 executive director to vice president -- 11 A. Yesterday. 12 Q. -- yesterday, so... 13 Will your job responsibilities 14 change or have they changed already? 15 A. They haven't changed yet. I'm 16 sure they probably will evolve. It's usually 17 more of an evolvement than a direct -- when 18 you get the title, you don't -- there's not 19 always change. Usually it's more of a 20 grooming situation, where you're -- by the 21 time you get promoted, it's -- you're -- 22 normally you're already kind of doing what 23 they would like you to do. 24 Q. During the period that you were 25 director of customer service and your -- or</p>
<p style="text-align: right;">Page 67</p> <p>1 correct? 2 A. 15 years? I don't believe it's 3 been that long. 4 Q. So it was 13 years as director? 5 A. Uh-huh. 6 Q. Is that right? 7 A. Yes. 8 Q. And then one to two years as 9 executive director? 10 A. Yes. 11 Q. So 14 to 15 years is 12 approximately the tenure of your oversight of 13 the department; would you agree with that? 14 A. Approximately, yes. 15 Q. So during that 14- or 15-year 16 period, was there ever a point in time during 17 which either the Melville verifications 18 department team or the Reno verifications 19 department team did not have responsibility 20 for ensuring compliance with all state and 21 federal licensure requirements with respect 22 to class II controlled substances? 23 A. No. 24 Q. I apologize if I asked this 25 earlier, but did your job responsibilities</p>	<p style="text-align: right;">Page 69</p> <p>1 executive director of customer service, was 2 Mr. Abreu always within the department? 3 A. Yes. 4 Q. And did he have the same 5 general role during that time period? 6 A. Yes. 7 Q. So what were Mr. Abreu's 8 responsibilities with respect to the 9 verifications department during that 14-, 10 15-year time period? 11 MR. JONES: Object to the form. 12 A. Yeah, because it -- there's 13 been -- there's been changes over that time 14 period. 15 BY MR. ACKERMAN: 16 Q. Okay. So at the beginning, 17 what were Mr. Abreu's job responsibilities? 18 A. Can you -- I don't know what 19 that means. 20 Q. Sure. 21 A. The beginning. 22 Q. At the time that -- whenever it 23 was that you assumed responsibility for the 24 verifications department which was at some 25 point after you became director of customer</p>

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<p style="text-align: right;">Page 70</p> <p>1 service, correct?</p> <p>2 A. Correct.</p> <p>3 Q. Was Mr. -- did Mr. Abreu have</p> <p>4 responsibility for the verifications</p> <p>5 department at that same time?</p> <p>6 A. No.</p> <p>7 Q. For approximately how long were</p> <p>8 you overseeing the verifications department</p> <p>9 before Mr. Abreu had responsibility for that</p> <p>10 department?</p> <p>11 A. Several years.</p> <p>12 Q. So during that -- we'll call it</p> <p>13 that initial several-year period, what were</p> <p>14 your job responsibilities with respect to the</p> <p>15 verifications department?</p> <p>16 A. Just general oversight of</p> <p>17 support, more of a supportive role, I guess,</p> <p>18 and trying to make sure that they had what</p> <p>19 they need to do their jobs effectively.</p> <p>20 Q. So does general oversight mean</p> <p>21 ensuring that individuals complied with</p> <p>22 company policies?</p> <p>23 MR. JONES: Object to the form.</p> <p>24 BY MR. ACKERMAN:</p> <p>25 Q. Let me ask the question</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. I'm going to ask a few more</p> <p>2 questions about that.</p> <p>3 A. Okay.</p> <p>4 Q. What is the difference at</p> <p>5 Henry Schein between the regulatory -- the</p> <p>6 regulatory department and the verifications</p> <p>7 department?</p> <p>8 MR. JONES: Object to the form.</p> <p>9 A. The regulatory department is</p> <p>10 comprised of primarily lawyers, and they're</p> <p>11 responsible for establishing the business</p> <p>12 rules and regulations.</p> <p>13 The license verifications team</p> <p>14 is responsible really for the enforcement of</p> <p>15 the business rules. We collaborate -- we</p> <p>16 collaborate quite closely with them.</p> <p>17 BY MR. ACKERMAN:</p> <p>18 Q. During that initial</p> <p>19 several-year period before Mr. Abreu became</p> <p>20 manager of customer service, did your job</p> <p>21 responsibilities include ensuring that the</p> <p>22 representatives that you oversaw were</p> <p>23 enforcing the rules correctly?</p> <p>24 MR. JONES: Objection.</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 71</p> <p>1 differently.</p> <p>2 A. Yeah.</p> <p>3 Q. During that -- you said you had</p> <p>4 general oversight. What does general</p> <p>5 oversight mean?</p> <p>6 MR. JONES: Objection, asked</p> <p>7 and answered.</p> <p>8 A. Making sure that the team is --</p> <p>9 has what they need to do -- to do their job;</p> <p>10 supporting the manager of the department,</p> <p>11 collaborating with the regulatory department.</p> <p>12 BY MR. ACKERMAN:</p> <p>13 Q. Who was the manager during that</p> <p>14 initial several-year period?</p> <p>15 A. Lisa Matalon.</p> <p>16 Q. And is Lisa Matalon still with</p> <p>17 Henry Schein?</p> <p>18 A. Yes.</p> <p>19 Q. And what position is she now?</p> <p>20 A. Lisa is the director of</p> <p>21 customer service.</p> <p>22 Q. Before the break, you made a</p> <p>23 distinction between the regulatory department</p> <p>24 and the verification department.</p> <p>25 A. (Nods head.)</p>	<p style="text-align: right;">Page 73</p> <p>1 BY MR. ACKERMAN:</p> <p>2 Q. Was there anyone else at</p> <p>3 Henry Schein who was responsible for</p> <p>4 determining whether -- during that</p> <p>5 several-year period, was there anyone else at</p> <p>6 Henry Schein who was responsible for</p> <p>7 determining whether the representatives were</p> <p>8 enforcing the rules correctly?</p> <p>9 MR. JONES: Same objection.</p> <p>10 A. Yes.</p> <p>11 BY MR. ACKERMAN:</p> <p>12 Q. And who was that?</p> <p>13 A. The regulatory department; the</p> <p>14 manager, our manager.</p> <p>15 Q. The manager meaning</p> <p>16 Lisa Matalon?</p> <p>17 A. Uh-huh.</p> <p>18 Q. Is that a yes?</p> <p>19 A. Yes. Yes. Sure.</p> <p>20 Q. And then once Mr. Abreu</p> <p>21 joined -- at some point in time, Mr. Abreu</p> <p>22 joined the verifications department; is that</p> <p>23 correct?</p> <p>24 A. He started as the supervisor of</p> <p>25 verifications, I believe.</p>

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<p>1 Q. Okay. Maybe we should make it 2 even more elementary probably for me. 3 A. Okay. 4 Q. But what is the leadership -- 5 or in -- when you started with the 6 verifications department, what was the 7 leadership structure of the verifications 8 department? 9 MR. JONES: Object to the form. 10 A. At the time I took 11 responsibility -- 12 BY MR. ACKERMAN: 13 Q. Yes. 14 A. -- for it, it was included in 15 my other scope of managing the customer 16 service teams. Lisa Matalon was hired as the 17 manager of customer service for Melville, 18 New York, and she also had responsibility, I 19 believe, for the verifications team in 20 Melville, New York. 21 Q. When you assumed responsibility 22 for the verifications department, was there 23 any verifications department in Reno? 24 A. Yes. 25 Q. And who had responsibility for</p>	<p>1 your role as director of customer service 2 included oversight of the verifications 3 department? 4 A. Yes. 5 Q. And the -- it looks here there 6 were the verifications department -- if you 7 look at Exhibit 1, there are in Reno 8 representatives and a supervisor; is that 9 correct? 10 A. Yes. 11 Q. At the time that you assumed 12 responsibility for the verification 13 department, were there representatives and a 14 supervisor in Reno? 15 A. Yes. 16 Q. And who was the supervisor in 17 Reno? 18 A. Maggie Koromi. 19 Q. And is Ms. Koromi still with 20 Henry Schein? 21 A. Yes. 22 Q. And what is her position? 23 A. Supervisor of verifications in 24 Reno. 25 Q. Has she held that position</p>
Page 75	Page 77
<p>1 the verifications department in Reno before 2 you assumed responsibility for that 3 department? 4 A. It was from New York, so I 5 believe it was Donna Remondino, Lisa Matalon. 6 Q. So at some point in time -- and 7 we're not quite sure of the year -- you 8 assumed responsibility for the verifications 9 department, correct? 10 A. Yes. 11 Q. Did you have direct oversight 12 responsibility over the sales 13 representatives? 14 A. No. 15 Q. Who had direct oversight 16 responsibility over the sales representatives 17 at that point in time? 18 MR. JONES: Object to the form. 19 A. I need more specifics. I need 20 you to tell me what -- I don't know. We have 21 multiple divisions of sales. 22 BY MR. ACKERMAN: 23 Q. Okay. So I'm talking about 24 just the verifications department. And so 25 there was a point when you became -- or when</p>	<p>1 throughout the entire time? 2 A. She started as a customer 3 service rep. 4 Q. So Ms. Koromi had a direct 5 supervisor, correct? 6 A. Yes. 7 Q. And when you first assumed 8 responsibility for the verifications 9 department, who was Ms. Koromi's direct 10 supervisor? 11 A. I believe it was Donna 12 Remondino or Shaun. 13 Q. And what was Donna Remondino's 14 position at -- 15 A. She was -- I apologize. 16 Q. Yeah. 17 -- at that time? 18 A. I apologize. 19 I believe supervisor of 20 verifications. 21 Q. And what was Mr. Abreu's 22 position at that time? 23 A. At that time I believe Shaun 24 was in gatekeeping. I believe he was a team 25 leader in our gatekeeping group.</p>

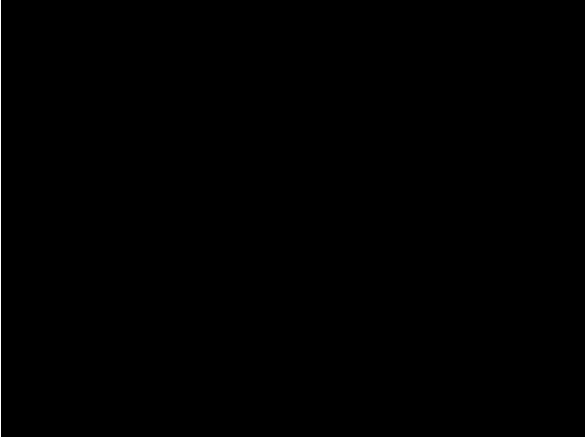
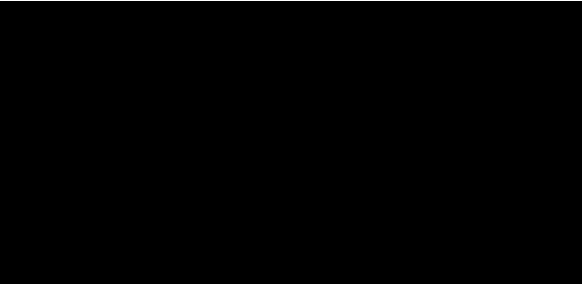
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<p style="text-align: right;">Page 78</p> <p>1 Q. And then I assume that</p> <p>2 Ms. Remondino or Mr. Abreu had a direct</p> <p>3 supervisor with respect to their</p> <p>4 responsibility with the verifications</p> <p>5 department; is that right?</p> <p>6 A. Uh-huh. Yeah. Can you clarify</p> <p>7 what year?</p> <p>8 Q. Yeah.</p> <p>9 A. Okay.</p> <p>10 Q. I'm still talking about the</p> <p>11 initial period when you took over the -- or</p> <p>12 when you assumed responsibility --</p> <p>13 A. Okay.</p> <p>14 Q. -- for the verifications</p> <p>15 department.</p> <p>16 MR. JONES: Let me just jump</p> <p>17 in. I know we produced it. I don't</p> <p>18 know if you have it, but the org</p> <p>19 charts, that might facilitate some of</p> <p>20 this.</p> <p>21 MR. ACKERMAN: Okay.</p> <p>22 MR. JONES: But I don't know if</p> <p>23 you've got them.</p> <p>24 MR. ACKERMAN: Yeah, I don't</p> <p>25 have them with me.</p>	<p style="text-align: right;">Page 80</p> <p>1 and we have a supervisor in Melville now,</p> <p>2 Christine Stratton, and they both report to</p> <p>3 Shaun directly.</p> <p>4 Q. Okay. Thank you.</p> <p>5 So going back to kind of my</p> <p>6 original line of questioning on this, which</p> <p>7 is it's your testimony that the regulatory</p> <p>8 department is responsible for writing the</p> <p>9 rules and the verifications department is</p> <p>10 responsible for enforcing the rules; is that</p> <p>11 right?</p> <p>12 MR. JONES: Object to the form.</p> <p>13 A. I believe so.</p> <p>14 BY MR. ACKERMAN:</p> <p>15 Q. And that's with respect to</p> <p>16 suspicious order monitoring, correct?</p> <p>17 A. Regulatory is responsible for</p> <p>18 the -- for the creation of the policies.</p> <p>19 Q. For suspicious order</p> <p>20 monitoring?</p> <p>21 A. Right.</p> <p>22 Q. Then the verifications</p> <p>23 department is responsible for enforcing those</p> <p>24 policies with respect to suspicious order</p> <p>25 monitoring; is that right?</p>
<p style="text-align: right;">Page 79</p> <p>1 MR. JONES: Never mind. I was</p> <p>2 going to say if you have them in</p> <p>3 there, wheel them out and probably --</p> <p>4 MR. ACKERMAN: No, I</p> <p>5 understand.</p> <p>6 BY MR. ACKERMAN:</p> <p>7 Q. That initial period, to whom</p> <p>8 did Ms. Remondino report?</p> <p>9 A. I believe Lisa.</p> <p>10 Q. Lisa Matalon?</p> <p>11 A. I believe so.</p> <p>12 Q. And then Lisa Matalon reported</p> <p>13 to you?</p> <p>14 A. Yes.</p> <p>15 Q. Understood.</p> <p>16 And that reporting structure,</p> <p>17 I'll call it, where you have -- it looks like</p> <p>18 a supervisor to a manager; is that right?</p> <p>19 A. Uh-huh. Yes.</p> <p>20 Q. And then a manager to a</p> <p>21 director; is that right?</p> <p>22 A. Yes. Yes.</p> <p>23 Q. Is that still in place today?</p> <p>24 A. Shaun is director today, and</p> <p>25 Maggie is the supervisor of the Reno team,</p>	<p style="text-align: right;">Page 81</p> <p>1 A. Yes.</p> <p>2 Q. So the question I have is: Who</p> <p>3 is responsible for ensuring that the policies</p> <p>4 with respect to suspicious order monitoring</p> <p>5 that are written by the regulatory department</p> <p>6 are enforced correctly?</p> <p>7 MR. JONES: Object to the form.</p> <p>8 A. Regulatory. We partner with</p> <p>9 regulatory, and it's -- I guess I suppose</p> <p>10 it's all of our responsibilities.</p> <p>11 BY MR. ACKERMAN:</p> <p>12 Q. Okay. And how does -- has</p> <p>13 regulatory -- let's talk about today.</p> <p>14 Is regulatory responsible for</p> <p>15 ensuring that policies concerning suspicious</p> <p>16 order monitoring of controlled substances are</p> <p>17 enforced correctly?</p> <p>18 MR. JONES: Object to the form.</p> <p>19 A. I don't know. Yeah, I don't</p> <p>20 know.</p> <p>21 BY MR. ACKERMAN:</p> <p>22 Q. Okay. Today who is responsible</p> <p>23 for ensuring that the sales representatives</p> <p>24 in the verifications department are correctly</p> <p>25 enforcing policies concerning suspicious</p>

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<p style="text-align: right;">Page 82</p> <p>1 order monitoring of controlled substances?</p> <p>2 MR. JONES: Object to the form.</p> <p>3 A. There's no salespeople in</p> <p>4 verifications.</p> <p>5 BY MR. ACKERMAN:</p> <p>6 Q. Okay. So I'll state it</p> <p>7 differently. Thank you.</p> <p>8 A. Okay.</p> <p>9 Q. Today at Henry Schein, who or</p> <p>10 what department is responsible for ensuring</p> <p>11 that the representatives in the verifications</p> <p>12 department are correctly enforcing policies</p> <p>13 concerning suspicious order monitoring of</p> <p>14 controlled substances?</p> <p>15 MR. JONES: Object to the form.</p> <p>16 A. Our regulatory department and</p> <p>17 our -- and our verifications management team.</p> <p>18 BY MR. ACKERMAN:</p> <p>19 Q. And how does the regulatory</p> <p>20 department go about ensuring that the</p> <p>21 policy -- that the verifications department</p> <p>22 is correctly enforcing policies related to</p> <p>23 suspicious order monitoring of controlled</p> <p>24 substances?</p> <p>25 MR. JONES: Object to the form.</p>	<p style="text-align: right;">Page 84</p> <p>1 correctly enforced, how would you find out?</p> <p>2 A. I would ask Shaun, Maggie or</p> <p>3 Christine.</p> <p>4 Q. I'm sorry, the last name was</p> <p>5 Christine?</p> <p>6 A. Christine Stratton. She's the</p> <p>7 supervisor in Melville.</p> <p>8 Q. During your entire tenure of</p> <p>9 overseeing the verifications department, have</p> <p>10 your job responsibilities ever included</p> <p>11 ensuring that the verifications department</p> <p>12 representatives are correctly following</p> <p>13 policies related to suspicious order</p> <p>14 monitoring of controlled substances?</p> <p>15 MR. JONES: Object to the form.</p> <p>16 A. I don't -- I don't think so.</p> <p>17 BY MR. ACKERMAN:</p> <p>18 Q. During your entire tenure at</p> <p>19 Henry Schein, have you ever been involved in</p> <p>20 the development of suspicious order</p> <p>21 monitoring policies at the company?</p> <p>22 A. No.</p> <p>23 MR. JONES: Object to the form.</p> <p>24 A. No.</p> <p>25 MR. JONES: Just pause so that</p>
<p style="text-align: right;">Page 83</p> <p>1 Answer, if you know.</p> <p>2 A. I don't know. I don't know.</p> <p>3 BY MR. ACKERMAN:</p> <p>4 Q. How does the verifications</p> <p>5 department management team go about ensuring</p> <p>6 that the verifications department</p> <p>7 representatives are correctly enforcing</p> <p>8 policies related to suspicious order</p> <p>9 monitoring of controlled substances?</p> <p>10 MR. JONES: Object to the form.</p> <p>11 A. Yeah, I really don't know.</p> <p>12 BY MR. ACKERMAN:</p> <p>13 Q. Okay. If you wanted to find</p> <p>14 out how the regulatory department goes about</p> <p>15 ensuring that those policies are correctly</p> <p>16 enforced, how would you do it?</p> <p>17 A. I would ask Shaun or our</p> <p>18 regulatory department.</p> <p>19 Q. Who in the regulatory</p> <p>20 department would you ask?</p> <p>21 A. Normally Sergio Tejada or</p> <p>22 Jeff Peacock.</p> <p>23 Q. And if you wanted to find out</p> <p>24 how the verification management team goes</p> <p>25 about ensuring that those policies are</p>	<p style="text-align: right;">Page 85</p> <p>1 I don't interrupt you --</p> <p>2 THE WITNESS: I'm sorry.</p> <p>3 MR. JONES: -- or him. Thank</p> <p>4 you.</p> <p>5 BY MR. ACKERMAN:</p> <p>6 Q. During your tenure, your entire</p> <p>7 tenure at Henry Schein, have you been</p> <p>8 involved in any disciplinary actions against</p> <p>9 any verifications department representatives</p> <p>10 for failing to properly follow Henry Schein's</p> <p>11 suspicious order monitoring policies?</p> <p>12 MR. JONES: Object to the form.</p> <p>13 MR. ACKERMAN: What's the basis</p> <p>14 for that objection?</p> <p>15 MR. JONES: It's overly broad,</p> <p>16 vague and ambiguous as to disciplinary</p> <p>17 actions, to failing to properly --</p> <p>18 whatever properly means -- follow</p> <p>19 Henry Schein's suspicious order</p> <p>20 monitoring policies. Which policies</p> <p>21 are these specific SOPs? Are they</p> <p>22 pertaining to regulatory policies?</p> <p>23 Are they pertaining to verifications</p> <p>24 policies, and what time period?</p> <p>25 MR. ACKERMAN: Well, the time</p>

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<p style="text-align: right;">Page 86</p> <p>1 period is in the -- it's not even 2 worth the argument. 3 BY MR. ACKERMAN: 4 Q. During your tenure overseeing 5 the verifications department, were you 6 involved in any disciplinary actions against 7 verifications department representatives? 8 A. Nothing specifically that I 9 recall. 10 Q. Did disciplinary actions for 11 verifications department representatives fall 12 within your job responsibilities? 13 A. Not directly, no. 14 Q. There were others who would 15 have been responsible for that? 16 A. Yes. 17 Q. And who would those people have 18 been? 19 A. The department manager, 20 department supervisors. 21 MR. ACKERMAN: Let's mark this 22 as Exhibit 2. 23 (HenrySchein-Brandt Deposition 24 Exhibit 2 marked.) 25 ///</p>	<p style="text-align: right;">Page 88</p>  <p>15 Q. Are you aware of written 16 procedures for controlled drug orders that 17 were in existence during your oversight, the 18 time period that you oversaw the 19 verifications department? 20 A. Yes. 21 Q. Were they similar to these 22 procedures? 23 MR. JONES: Object to the form. 24 A. I don't know. I don't know. 25 It's an evolution, so we update. The</p>
<p style="text-align: right;">Page 87</p> <p>1 BY MR. ACKERMAN: 2 Q. Mr. Brandt, the court reporter 3 has handed you what's been marked as 4 Exhibit 2, which is a multipage document 5 numbered HSI-MDL_00404226 through 00404228. 6 I just noticed my copy of the 7 pages are out of order. Are they out of 8 order on your copy as well? 9 A. I'm not sure. 10 Q. No, it looks like yours -- 11 MR. JONES: Mine's in order. 12 MR. ACKERMAN: Yeah, so let me 13 rearrange mine so that we're talking 14 about the same document. 15 THE WITNESS: Okay. 16 BY MR. ACKERMAN: 17 Q. Take a moment to review this 18 document, let me know when you've had a 19 chance to review it. 20 A. Okay. 21 (Document review.) 22 A. Okay. 23 BY MR. ACKERMAN: 24 Q. You've reviewed it? 25 A. Yes.</p>	<p style="text-align: right;">Page 89</p> <p>1 regulatory team from time to time updates 2 these, and we partner with them to help 3 update. Hence, they can try to keep them 4 consistent. 5 BY MR. ACKERMAN: 6 Q. Are you involved with the 7 updating of the verification procedures -- 8 let me reask that question. 9 A. Okay. 10 Q. Were you involved during your 11 tenure overseeing the verifications 12 department with updates to the verification 13 procedures for controlled drug orders? 14 A. No, I don't believe so.</p>  <p>24 Q. Was that Henry Schein's policy 25 during your tenure overseeing the</p>

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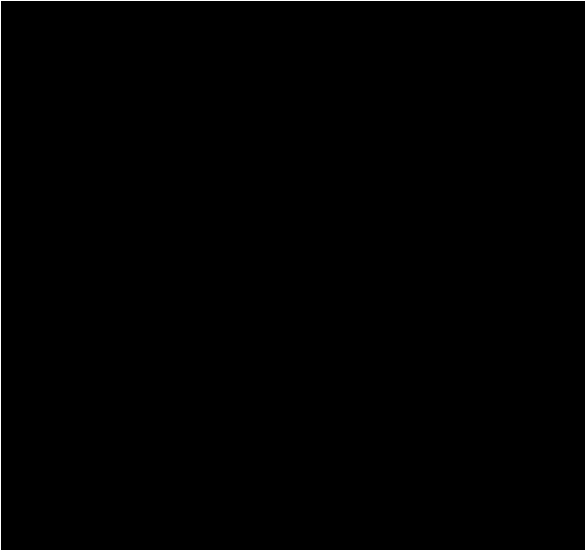

<p style="text-align: right;">Page 90</p> <p>1 verifications department?</p> <p>2 A. Like I said, I -- the policies</p> <p>3 have -- they're updated regularly, and it</p> <p>4 happen -- it comes from the regulatory</p> <p>5 department. So I would say generally yes,</p> <p>6 but it has -- the policies and procedures</p> <p>7 have evolved significantly since this time.</p> <p>[REDACTED]</p> <p>11 Have you at any point during</p> <p>12 your tenure at Henry Schein had any role in</p> <p>13 reporting orders to the local DEA office of</p> <p>14 controlled substances?</p> <p>15 A. Myself, no.</p> <p>16 Q. Okay. Who at Henry Schein</p> <p>17 had -- was responsible for reporting orders</p> <p>18 of controlled substances to the local DEA</p> <p>19 office?</p> <p>20 MR. JONES: Object to the form.</p> <p>21 Is there a time period that</p> <p>22 you're wanting to focus on?</p> <p>23 MR. ACKERMAN: Sure.</p> <p>24 BY MR. ACKERMAN:</p> <p>25 Q. During your tenure at</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. What other responsibilities did</p> <p>2 the verifications representatives have?</p> <p>3 MR. JONES: What time period?</p> <p>4 BY MR. ACKERMAN:</p> <p>5 Q. During your tenure overseeing</p> <p>6 the verifications department --</p> <p>7 MR. JONES: Object to the form.</p> <p>8 BY MR. ACKERMAN:</p> <p>9 Q. -- did the verifications</p> <p>10 representatives do anything other than</p> <p>11 reviewing orders to determine whether they</p> <p>12 were suspicious?</p> <p>13 MR. JONES: Object to the form.</p> <p>14 A. Answer phone calls to do the</p> <p>15 same.</p> <p>16 BY MR. ACKERMAN:</p> <p>17 Q. Answer phone calls from --</p> <p>18 A. From customers, yeah.</p> <p>19 Q. Regarding special suspicious</p> <p>20 orders?</p> <p>21 A. Yeah, reaching out to customers</p> <p>22 to get a copy of the license, answering a</p> <p>23 question if there was a question, advising</p> <p>24 them that an order was pending for review.</p> <p>25 Q. So if your job responsibility</p>
<p style="text-align: right;">Page 91</p> <p>1 Henry Schein.</p> <p>2 A. So the regulatory team, the</p> <p>3 department manager. So I think it -- those</p> <p>4 would be the two that primarily were probably</p> <p>5 responsible for that.</p> <p>[REDACTED]</p> <p>9 Do you see that phrase?</p> <p>10 A. Uh-huh.</p> <p>11 Q. During your tenure at</p> <p>12 Henry Schein overseeing the verifications</p> <p>13 department, did you have any role in</p> <p>14 conducting the review as to whether an order</p> <p>15 was suspicious or not?</p> <p>16 A. No.</p> <p>17 Q. And during that same time</p> <p>18 period, who generally was responsible for</p> <p>19 conducting that review?</p> <p>20 A. The representatives, so it</p> <p>21 would be the verifications representatives.</p> <p>22 Q. Thanks.</p> <p>23 So here's what I'm trying to</p> <p>24 understand.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 93</p> <p>1 as director of customer service included</p> <p>2 oversight of the verifications department,</p> <p>3 what aspects of the -- what aspects of the</p> <p>4 verifications department were you overseeing</p> <p>5 if you weren't involved in the review of</p> <p>6 orders as to whether they were suspicious or</p> <p>7 if you weren't involved in reporting orders</p> <p>8 to the local DEA office?</p> <p>9 MR. JONES: Object to the form,</p> <p>10 asked and answered.</p> <p>11 A. So it wasn't my direct</p> <p>12 responsibility. It was the responsibility of</p> <p>13 the agents or supervisor and manager.</p> <p>14 BY MR. ACKERMAN:</p> <p>15 Q. So what was your direct</p> <p>16 responsibility?</p> <p>17 A. I had a responsibility for</p> <p>18 customer service. I had responsibility for</p> <p>19 the gatekeeping team and for the license</p> <p>20 verification team overall, to provide support</p> <p>21 to ensure that they had what they needed to</p> <p>22 do their job, to collaborate with the</p> <p>23 regulatory team when it comes to license</p> <p>24 verifications.</p> <p>25 Q. When you say for the</p>

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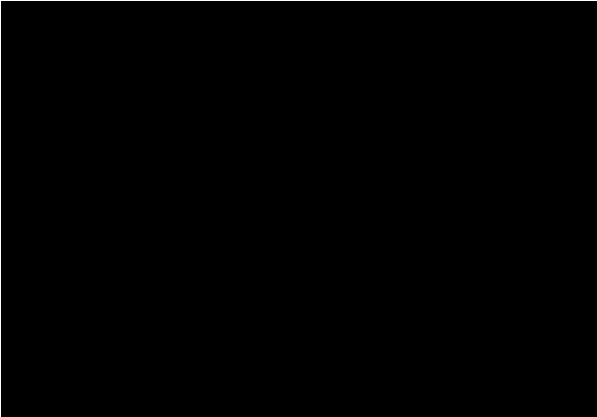

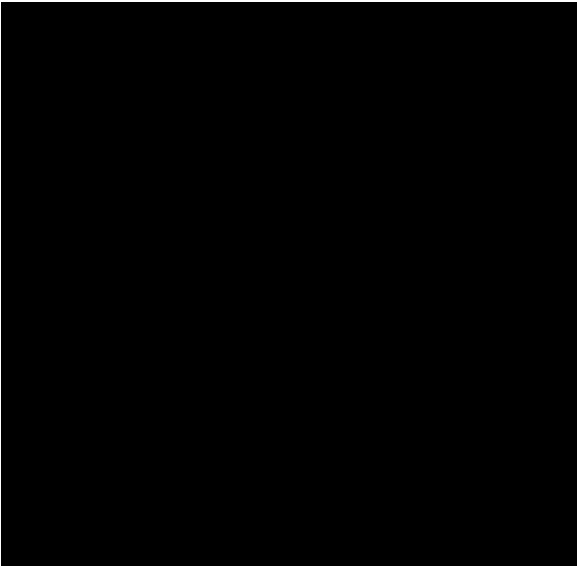
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<p>1 verifications -- let's just focus on the</p> <p>2 verifications team.</p> <p>3 A. Okay.</p> <p>4 Q. To have what they needed to do</p> <p>5 to perform their job, what does that mean?</p> <p>6 A. To make sure that the manager</p> <p>7 and the supervisors were managing the</p> <p>8 department the right way, that they had the</p> <p>9 staffing that they needed to help establish</p> <p>10 goals, things like that.</p> <p>11 Q. Were you involved in</p> <p>12 establishing goals for the department?</p> <p>13 A. Generally not. Generally it</p> <p>14 was the manager and the supervisors doing</p> <p>15 that.</p> <p>16 Q. Were you aware during your</p> <p>17 tenure of the goals for the department?</p> <p>18 A. Generally, yes.</p> <p>19 Q. And was part of your job</p> <p>20 responsibility ensuring that those goals were</p> <p>21 met?</p> <p>22 A. I would say yes.</p> <p>23 Q. Did the goals for the</p> <p>24 verifications department include compliance</p> <p>25 with Henry Schein's suspicious order</p>	<p>1 calls quickly as we can. We have to provide</p> <p>2 good service.</p> <p>3 Q. Because if you don't meet that</p> <p>4 goal, what could happen?</p> <p>5 A. If we don't meet that goal, the</p> <p>6 abandonment rate would be high. We could</p> <p>7 lose customers. We could cause customers to</p> <p>8 be dissatisfied.</p> <p>9 Q. Okay. So the next one you said</p> <p>10 is: Making sure we're reviewing orders</p> <p>11 correctly and accurately.</p> <p>12 A. Uh-huh.</p> <p>13 Q. Is that right?</p> <p>14 MR. JONES: You have to say</p> <p>15 yes, no.</p> <p>16 A. No, I'd say no to -- can you --</p> <p>17 BY MR. ACKERMAN:</p> <p>18 Q. Yeah. So I'm reading this off</p> <p>19 the screen, so I want to make sure I</p> <p>20 understand what this goal is.</p> <p>21 A. Okay. Okay. Okay.</p> <p>22 Q. So the next one I have on this</p> <p>23 screen is: Making sure we're reviewing</p> <p>24 orders correctly and accurately and making</p> <p>25 sure that the orders were released timely so</p>
Page 95	Page 97
<p>1 procedures?</p> <p>2 A. The goals? I don't think there</p> <p>3 was ever a goal that specifically said that,</p> <p>4 no.</p> <p>5 Q. What were some of the goals</p> <p>6 that the verifications department sought to</p> <p>7 meet during your tenure?</p> <p>8 A. Abandonment rate, making sure</p> <p>9 we're answering the phones quickly, making</p> <p>10 sure we're reviewing orders correctly and</p> <p>11 accurately and making sure that the orders</p> <p>12 were released timely so they could get</p> <p>13 shipped on time to the customers once they</p> <p>14 were cleared. Those are some of the key</p> <p>15 goals.</p> <p>16 Q. All right. Let's talk through</p> <p>17 some of those key goals.</p> <p>18 The abandonment rate, why was</p> <p>19 that a key goal?</p> <p>20 A. Why was it a key goal?</p> <p>21 Q. Yeah.</p> <p>22 A. It's a key goal in all of the</p> <p>23 three departments that we -- that I oversee,</p> <p>24 so it's important to us that when customers</p> <p>25 call, that we try to pick up their phone</p>	<p>1 they could get shipped on time.</p> <p>2 A. Uh-huh.</p> <p>3 Q. I think those might be two</p> <p>4 different goals or maybe it's one goal. I</p> <p>5 don't know. But that's my question.</p> <p>6 First of all, is that one goal</p> <p>7 or is that separate goals?</p> <p>8 A. That's two separate goals.</p> <p>9 Q. Okay. So what is the first</p> <p>10 goal there?</p> <p>11 A. The first goal is an</p> <p>12 accuracy -- overall accuracy rating for a</p> <p>13 rep.</p> <p>14 Q. All right. And what does the</p> <p>15 accuracy rating measure?</p> <p>16 A. I don't know. I know that's a</p> <p>17 goal, but it's really administered by the</p> <p>18 department manager and the supervisor.</p> <p>19 Q. Okay. And then the second goal</p> <p>20 is the timely release, is that right, of</p> <p>21 orders, right?</p> <p>22 A. Yes. Yes.</p> <p>23 Q. And what cause -- what would</p> <p>24 cause an order to not be released timely?</p> <p>25 MR. JONES: Object to the form.</p>

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<p style="text-align: right;">Page 98</p> <p>1 A. There's a lot of different 2 variables. 3 BY MR. ACKERMAN: 4 Q. What are some of them? 5 A. To not be released timely? 6 Q. Yes. 7 A. If it's being reviewed, if 8 it's -- there's different reviews, so it 9 could be being reviewed in credit. It could 10 be reviewed in verifications. It could be a 11 new account that we're doing additional due 12 diligence. 13 Q. But in terms of a goal for the 14 verifications department, right? 15 A. Uh-huh. 16 Q. How would the verifications 17 department measure whether it met its goal 18 for orders being released timely? 19 A. We have a metric. There's a 20 metric that Shaun and the team use to 21 measure -- to measure getting the amount of 22 orders that we're able to get to the 23 distribution center in time to ship. 24 Q. And do you know what that 25 metric is?</p>	<p style="text-align: right;">Page 100</p>  <p>18 Q. Okay. Are you familiar with 19 that process at Henry Schein? 20 A. No. 21 Q. Was that process -- are you 22 aware during your tenure overseeing the 23 verifications department of any instance in 24 which a division head of the medical, dental 25 or veterinarian department reviewed the</p>
<p style="text-align: right;">Page 99</p> <p>1 A. I believe 98% currently. 2 Q. And that means 98% of what? 3 A. 98% of the orders that come in 4 that we're able to -- that we're able to 5 validate and approve, that we get those to 6 the shipping distribution center in time for 7 them to pick, pack and ship so that it will 8 make it to the customer. 9 Q. Does the verifications 10 department review every order? 11 A. No. 12 Q. What is the subset of orders 13 that are reviewed by the verifications 14 department? 15 A. The orders that pend to us. 16 Q. All right. Is the timely 17 release metric measured against all orders 18 that are reviewed by the verifications 19 department? 20 MR. JONES: Object to the form. 21 A. It's a metric against the 22 orders that get released. 23 BY MR. ACKERMAN: </p>	<p style="text-align: right;">Page 101</p> <p>1 customer's account to determine if the orders 2 are compatible with the practitioner's type 3 of practice and the customer's purchasing 4 pattern? 5 A. No. 6 MR. ACKERMAN: All right. You 7 can put that one aside. 8 Let's mark this as Exhibit 3. 9 (HenrySchein-Brandt Deposition 10 Exhibit 3 marked.) 11 BY MR. ACKERMAN: 12 Q. Mr. Brandt, the court reporter 13 has handed you what's been marked as 14 Deposition Exhibit 3. It's a multipage 15 document numbered HSI-MDL_194 through 204. 16 Take a moment to just review 17 this document. Let me know if you've -- and 18 let me know when you've had a chance to 19 review it. 20 A. Okay. 21 (Document review.) 22 BY MR. ACKERMAN: 23 Q. Have you reviewed the document? 24 A. Yes. 25 Q. Have you seen this document</p>

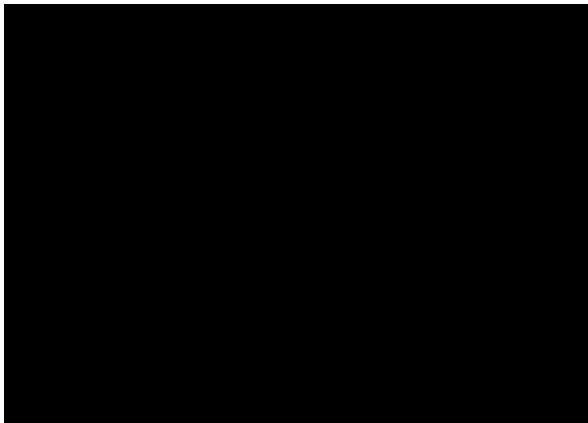
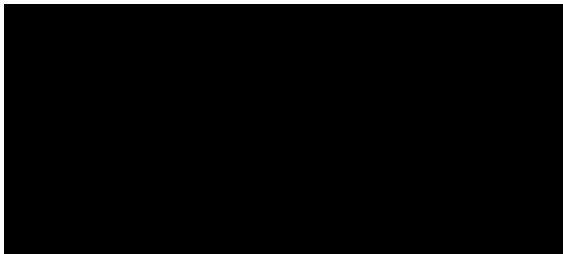


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<p style="text-align: right;">Page 102</p> <p>1 before?</p> <p>2 A. I guess I would say no. I</p> <p>3 don't recall. I may have, but I don't recall</p> <p>4 anything specifically. It's from 2012, so</p> <p>5 just prior to my -- I think prior to my</p> <p>6 involvement with verifications.</p> <p>7 Q. Okay. You testified earlier</p> <p>8 that you reviewed SOPs, when you assumed</p> <p>9 responsibility for the verifications</p> <p>10 department; is that right?</p> <p>11 A. I probably did, yes.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah.</p> <p>14 Q. Do you recall the names or</p> <p>15 subjects of any of the SOPs that you</p> <p>16 reviewed?</p> <p>17 A. I don't. I don't recall the</p> <p>18 exact document names. Probably would have</p> <p>19 been something like this.</p> <p>20 Q. In 2012, you were still</p> <p>21 director of the customer service department,</p> <p>22 correct?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Did you -- yes?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 104</p>  <p>14 A. He was one of the approves,</p> <p>15 yes, in regulatory.</p> <p>16 Q. Did you have any -- did you</p> <p>17 have any input into the drafting of this SOP?</p> <p>18 A. Not that I recall.</p> <p>19 Q. Did you draft the SOP?</p> <p>20 A. Not that I recall, no.</p> <p>21 Q. Were you involved in any</p> <p>22 discussion concerning the drafting of this</p> <p>23 SOP?</p> <p>24 A. Nothing specific that I recall,</p> <p>25 but possibly.</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. And this Exhibit 3 is an</p> <p>2 example of an SOP; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. Did you review this SOP in</p> <p>5 December 2012 or anytime thereafter?</p> <p>6 A. I don't know. I didn't sign</p> <p>7 it, so yeah, I don't know.</p> <p>8 Q. And so that was -- one of the</p> <p>9 questions I had, so we can just go there.</p> <p>10 A. Yeah.</p> 	<p style="text-align: right;">Page 105</p> <p>1 Q. Were you involved in any</p> <p>2 discussions concerning the need for revisions</p> <p>3 to an SOP?</p> <p>4 A. Possibly. I don't recall from</p> <p>5 back here, though.</p> <p>6 Q. Okay.</p> <p>7 A. Yeah.</p> 

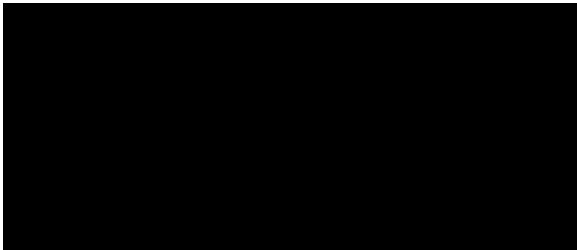
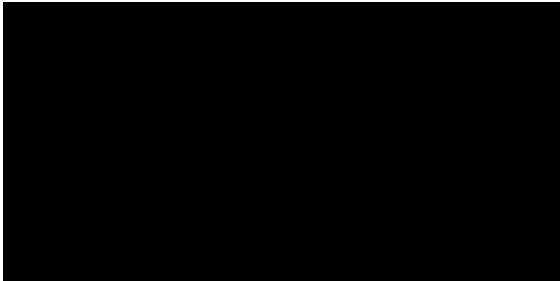
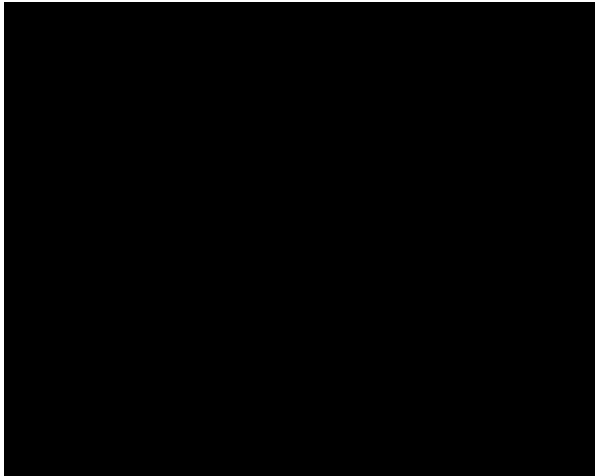
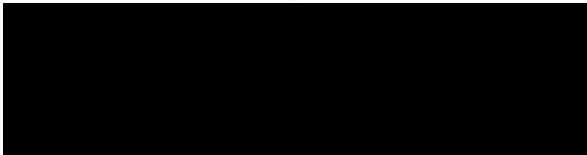
27 (Pages 102 to 105)

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<p style="text-align: right;">Page 106</p>  <p>14 Q. Is this document the first time 15 that Henry Schein's suspicious order 16 monitoring process was put in writing? 17 A. I don't know. 18 Q. If you wanted to know what the 19 first time was that Henry Schein's suspicious 20 order monitoring policy was put in writing, 21 how would you find out? 22 A. I would ask regulatory. 23 Q. Who in regulatory? 24 A. Probably Sergio Tejada or 25 Jeff Peacock.</p>	<p style="text-align: right;">Page 108</p> <p>1 team.</p>  <p>10 Q. Okay. Were you involved with 11 Henry Schein -- or did you have any 12 involvement in Henry Schein engaging a DEA 13 consulting firm to help design and implement 14 an enhanced suspicious order monitoring 15 system? 16 A. I'm aware of it, yeah. 17 Q. Were you involved in the 18 process? 19 A. No. 20 Q. How were you aware or how did 21 you become aware that Henry Schein engaged a 22 DEA consulting firm in 2008? 23 A. Conversations with regulatory. 24 Q. Were you told why Henry Schein 25 engaged a DEA consulting firm in 2008?</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. Look at page -- I guess it's 2 page 3 of this exhibit. 3 A. Okay.</p>  <p>14 Do you see that, that sentence? 15 A. I do, uh-huh. 16 Q. And I think we talked before: 17 Who at Henry Schein was responsible for 18 enforcing the system process or 19 system/process to monitor orders of unusual 20 size and frequency? 21 A. Who's responsible? 22 Q. Yes. 23 A. The team that's responsible? 24 Q. Yes. 25 A. Would be the verifications</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Yes. 2 Q. And what were you told? 3 A. My understanding was to help 4 create a threshold, systemic algorithm for 5 the order pend process. 6 Q. Do you know who the DEA 7 consulting firm is or was? 8 A. I believe Buzzeo, Ron Buzzeo. 9 MR. JONES: Dave has never 10 heard of them. 11 MR. ACKERMAN: Oh, I think we 12 will by the end of today. 13 BY MR. ACKERMAN: 14 Q. Let's go to page that's Bates 15 numbered HSI-MDL_198. 16 A. Okay.</p>  <p>19 Do you see that? 20 A. I do, yeah. 21 Q. Is this the process that would 22 be -- or should be followed by the 23 verifications team to determine whether to 24 ship a pending order? 25 MR. JONES: Object to the form.</p>


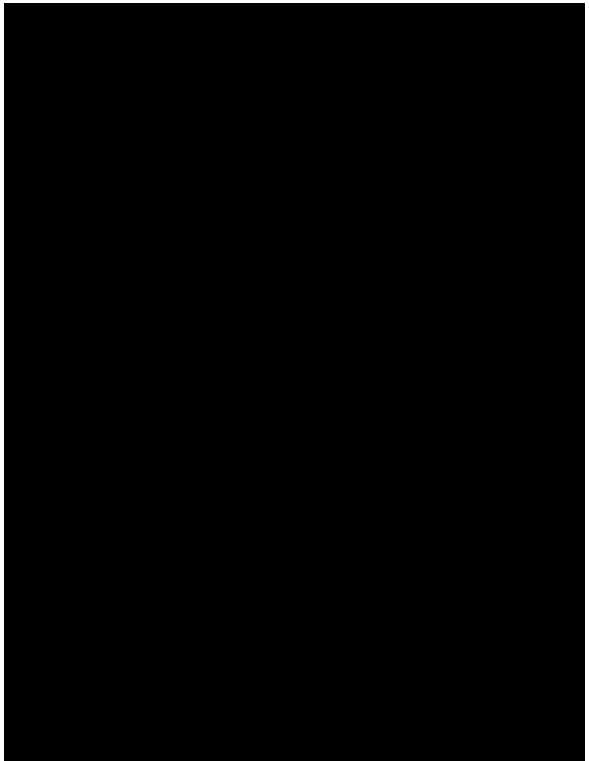
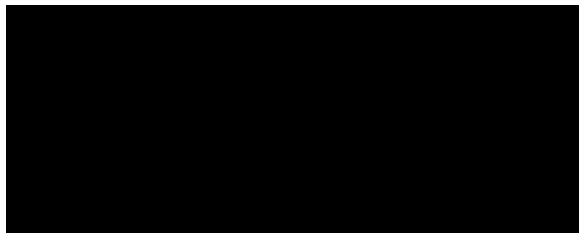
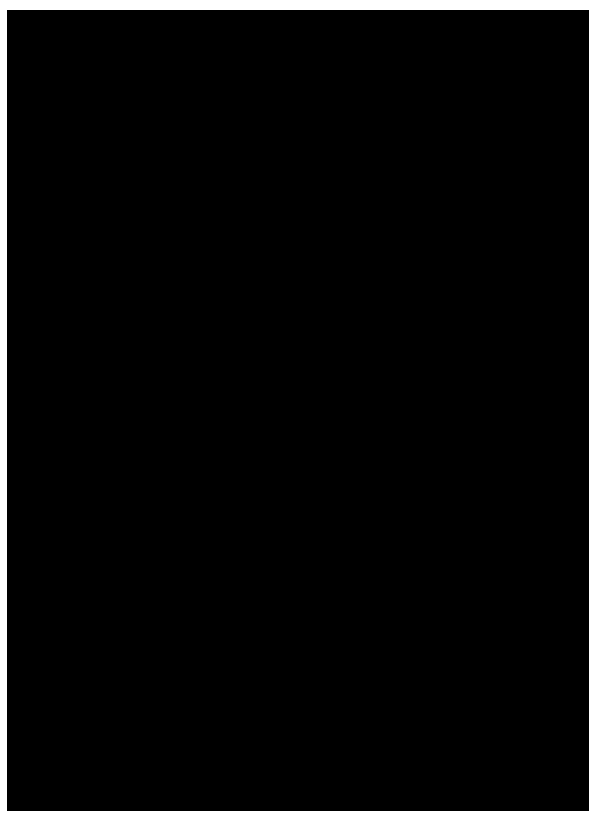
28 (Pages 106 to 109)

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<p style="text-align: right;">Page 110</p> <p>1 A. Can you ask your question 2 again? 3 BY MR. ACKERMAN: 4 Q. Yeah. Sure. What -- let's 5 just ask it this way.</p>  <p>14 BY MR. ACKERMAN: 15 Q. And the Know Your Customer 16 questions are contained in the questionnaire 17 that you described earlier, right? 18 A. Yes. 19 Q. And the verifications 20 department was the department responsible for 21 sending out that questionnaire, correct? 22 A. Yes. 23 Q. And the verifications 24 department is the department responsible for 25 reviewing the returned questionnaires, right?</p>	<p style="text-align: right;">Page 112</p> <p>1 A. The manager can get involved. 2 The supervisor may assist. But generally 3 it's the reviewers that would be reviewing 4 the questionnaires when they come back. 5 Q. And the reviewers, the manager, 6 the supervisor, they're all members of the 7 verifications department, right? 8 A. Yes.</p>  <p>18 And what does the reviewer look 19 at to determine whether the customer is 20 self-medicating? 21 A. We specifically ask that 22 question on the questionnaire, if they are 23 self-medicating, if they're using the 24 controlled substances for their own -- for 25 themselves.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. Yes.</p>  <p>17 Q. Who conducts the review of the 18 questionnaire to see if the information the 19 customer provided will justify the release of 20 current and future orders? 21 A. Our verifications -- we have a 22 position called reviewer, so we have people 23 who do that. 24 Q. Okay. Is anyone else 25 responsible for reviewing that questionnaire?</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. And the customer is required to 2 respond to that question? 3 A. Yes. 4 Q. Other than the customer's 5 response, does the reviewer -- or let's say 6 at this time in 2012, did the reviewer look 7 at anything else to determine whether the 8 customer might be self-medicating? 9 A. I don't know. 10 Q. If you wanted to know, how 11 would you find out? 12 A. Ask regulatory or Shaun.</p>  <p>18 Q. How does the reviewer determine 19 whether the customer is treating family and 20 friends? 21 A. There's a specific question 22 that asks that, asks the customer that 23 question. 24 Q. On the questionnaire, right? 25 A. On the questionnaire.</p>

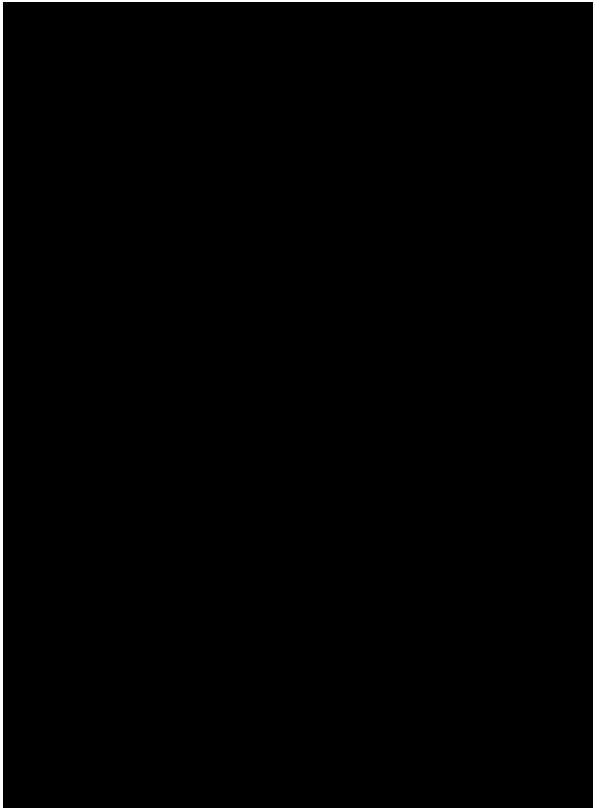

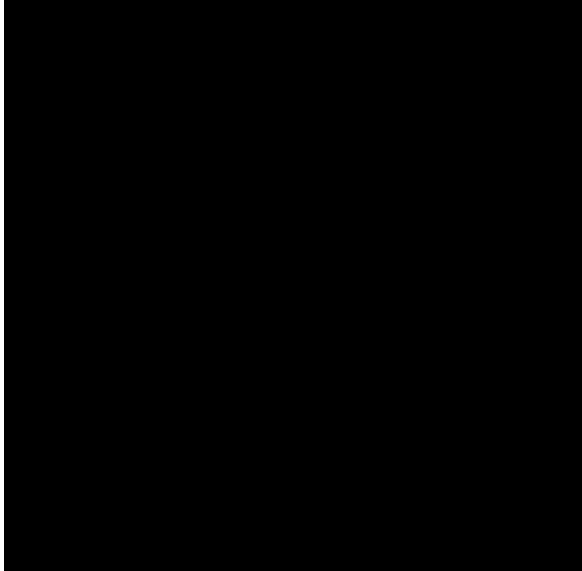
29 (Pages 110 to 113)

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<p style="text-align: right;">Page 114</p> <p>1 Q. And the customer has to answer 2 that question and return the questionnaire to 3 Henry Schein, correct? 4 A. Yes. 5 Q. Does the reviewer look at 6 anything other than the questionnaire to 7 determine whether the customer is treating 8 family and friends as part of the review 9 process? 10 A. I don't know. 11 Q. And if you wanted to know, how 12 would you find out? 13 A. I would ask Shaun or 14 regulatory. 15 Q. Okay. The next one says: Do 16 they accept insurance. 17 Do you see that? 18 A. Uh-huh. 19 Q. Is that also a question on the 20 questionnaire? 21 A. I believe it is.</p> 	<p style="text-align: right;">Page 116</p> <p>1 BY MR. ACKERMAN:</p> 
<p style="text-align: right;">Page 115</p>  <p>8 A. I do believe they are. 9 Q. All right. And the customer is 10 required to answer those questions on the 11 questionnaire and return it to the company, 12 correct? 13 A. Yes. 14 Q. And then does the reviewer look 15 at any information aside from the answer on 16 the questionnaire to determine whether the 17 answers are accurate? 18 MR. JONES: Object to the form. 19 I assume you're asking him as 20 of the time of this SOP? 21 MR. ACKERMAN: Yeah, at the 22 time of the SOP. 23 A. Yeah. I don't know. I don't 24 know. 25 ///</p>	<p style="text-align: right;">Page 117</p> 

30 (Pages 114 to 117)

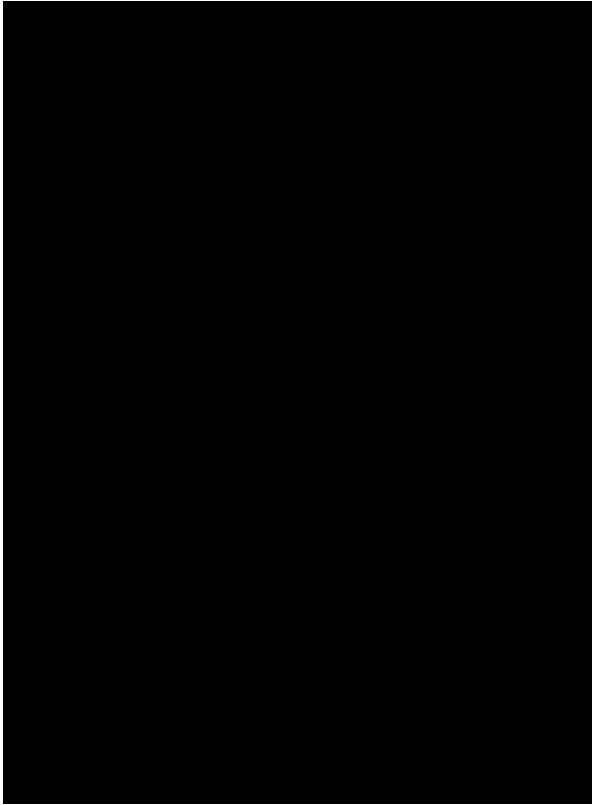
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<p style="text-align: right;">Page 118</p> 	<p style="text-align: right;">Page 120</p> <p>1 I'll call second-level reviewing of the -- of 2 the review process, the verifications review 3 process? 4 A. No. 5 MR. ACKERMAN: I tell you what. 6 Let's take a -- let's go off the 7 record for a moment. 8 THE VIDEOGRAPHER: The time is 9 now 11:45. Going off the record. 10 (Recess taken, 11:45?a.m. to 11 12:37?p.m.) 12 (HenrySchein-Brandt Deposition 13 Exhibit 4 marked.) 14 THE VIDEOGRAPHER: The time is 15 now 12:37. Back on the record. 16 BY MR. ACKERMAN: 17 Q. All right. Mr. Brandt, we're 18 back on the record. 19 A. Okay. 20 Q. The court reporter has handed 21 you what's been marked as Exhibit 4. It's a 22 multipage document beginning at Bates number 23 HSI-MDL_184 through 193. 24 Take a moment to review this 25 document. Let me know when you've had a</p>
<p style="text-align: right;">Page 119</p>  <p>5 Q. And what is the justification 6 letter? 7 A. I don't know specifically. I 8 know that it's a letter to get additional 9 information from a customer. 10 Q. Okay. And if you skip down a 11 little bit, it's -- there's a sentence that 12 begins: If the justification letter does not 13 satisfy our concerns. 14 Do you see that? 15 A. Yes. 16 Q. It says: Then the customer's 17 file will be escalated to the verifications 18 management team for additional review. 19 Do you see that? 20 A. I do. Yeah. 21 Q. Who is the verifications 22 management team? 23 A. The supervisor and the manager. 24 Q. Okay. So you as the director 25 didn't play any role in reviewing or what</p>	<p style="text-align: right;">Page 121</p> <p>1 chance to review it. 2 A. Okay. 3 (Document review.) 4 BY MR. ACKERMAN: 5 Q. All right. You've reviewed it? 6 A. Yes. 7 Q. Do you recognize Exhibit 4?</p> 

31 (Pages 118 to 121)

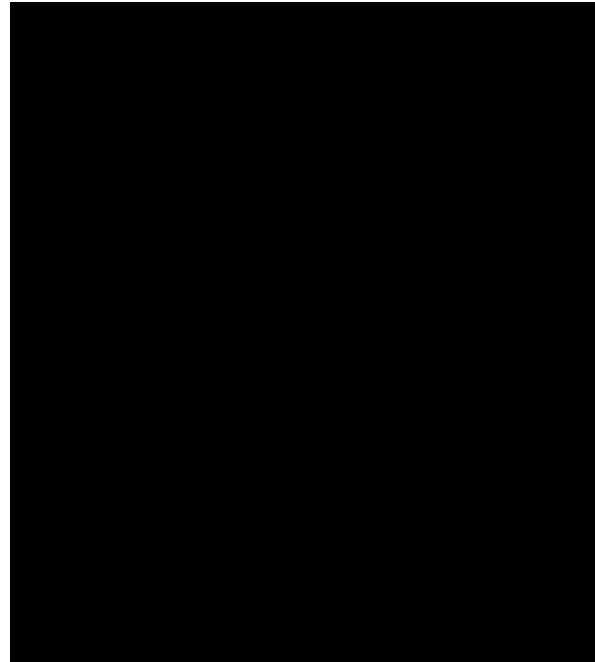
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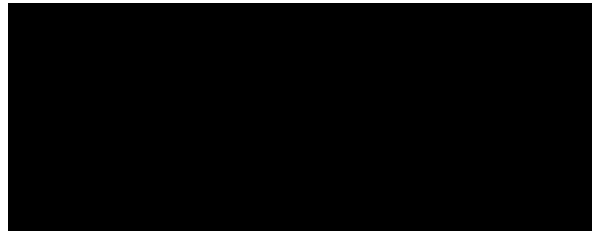


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- 1 A. Okay. Okay.
2 Q. So it might help to have them
3 side by side.
4 A. All right.

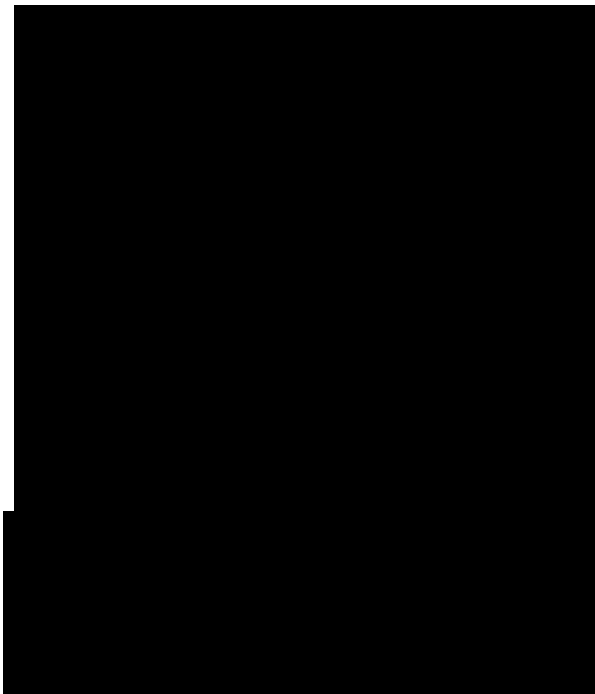


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- 8 Q. Neither of those signatures are
9 yours, are they?
10 A. No.
11 Q. Did you have any involvement in
12 the drafting of Exhibit 4?
13 A. No.
14 Q. Were you in -- involved in any
15 discussions regarding any revisions to this
16 SOP that resulted in Exhibit 4?
17 A. No, not that I recall.
18 Q. Did you have any input into the
19 creation of Exhibit 4?
20 A. I don't think so, no.
21 Q. Or the document of Exhibit 4?
22 A. No.
23 Q. I'm going to ask you a couple
24 of questions about some changes from
25 Exhibit 3 to Exhibit 4.

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- 23 Q. What was the concern about --
24 what concerns were expressed about the use of
25 the term "questionnaire"?

32 (Pages 122 to 125)

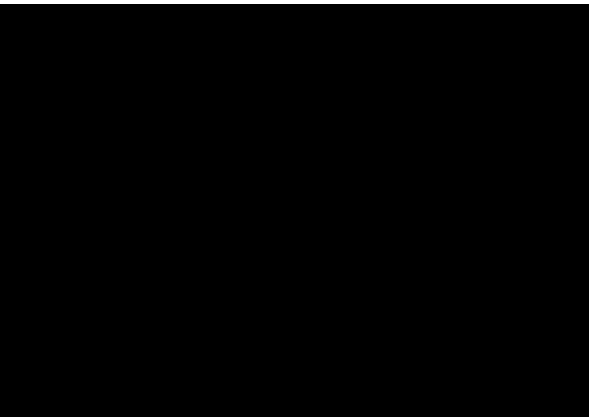
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1 A. My recollection of that is the
2 term "questionnaire" is like a survey, so
3 customers -- it didn't always -- in our
4 opinion, it didn't always reflect that -- you
5 know, the urgency of it or -- there was --
6 you know, or that they wouldn't complete it.
7 Yeah.

8 Q. At what point in time did the
9 title of the document change?

10 A. Oh, I don't know. So
11 apparently between 2012 and 2016 sometime. I
12 don't know the exact date.



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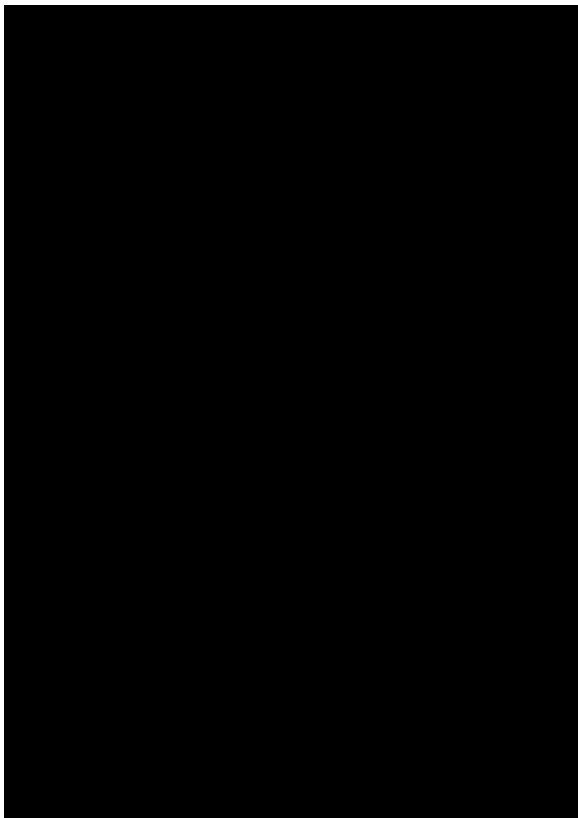
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33 (Pages 126 to 129)

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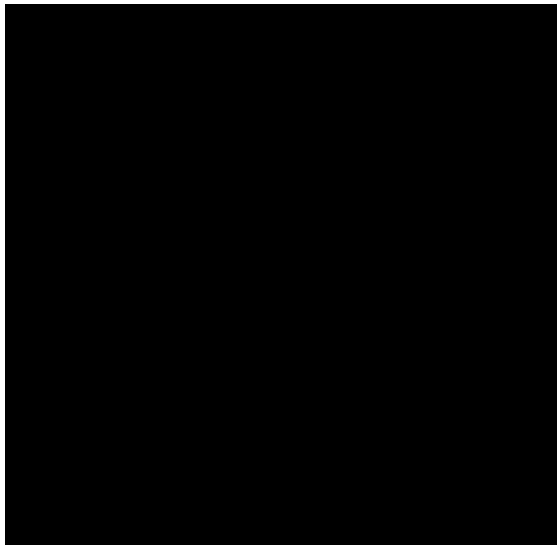
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1 A. I don't know. I -- yeah, I
2 would have to defer that to Shaun or
3 somebody.
4 Q. Okay.
5 A. Yeah, I don't know.
6 MR. JONES: Are you just asking
7 him as far as what's in print?
8 MR. ACKERMAN: No, no. I'm
9 asking in terms of what the
10 representatives were doing.
11 MR. JONES: Okay.
12 MR. ACKERMAN: Yeah.
13 MR. JONES: Object to form.
14 MR. ACKERMAN: What's the basis
15 for that objection?
16 MR. JONES: Lack of foundation,
17 calls for speculation, vague and
18 ambiguous, overly broad.
19 You're asking him what the
20 difference was that people were doing
21 under Exhibit 4 versus Exhibit 3?
22 MR. ACKERMAN: Correct, people
23 in the department that he oversaw.
24 MR. JONES: No, I understand
25 that. It's still overly broad as to

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18 A. Okay.
19 Q. But my question for you this
20 time is: Is there any -- between 2012 when
21 Exhibit 3 was issued and 2016 when Exhibit 4
22 was issued, is there any change in the method
23 or the procedures that the reviewers used to
24 evaluate the categories of information that
25 are listed here in Exhibit 4?

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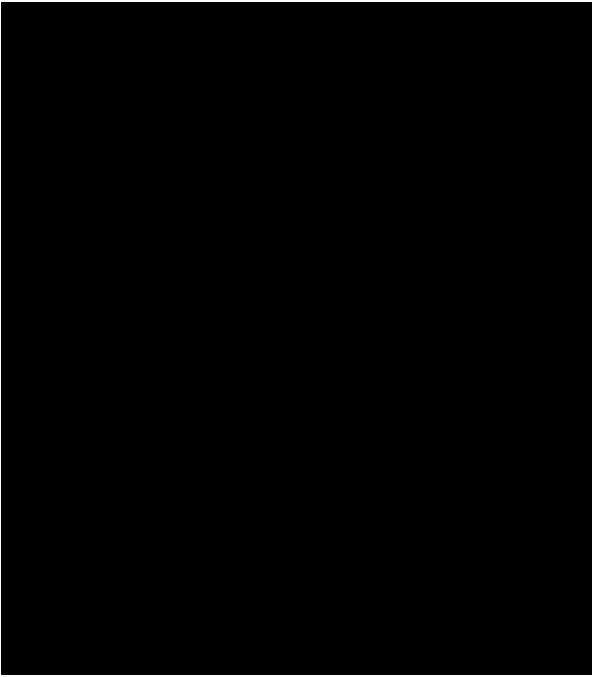
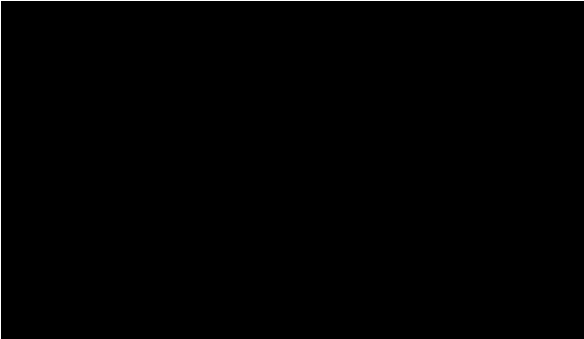
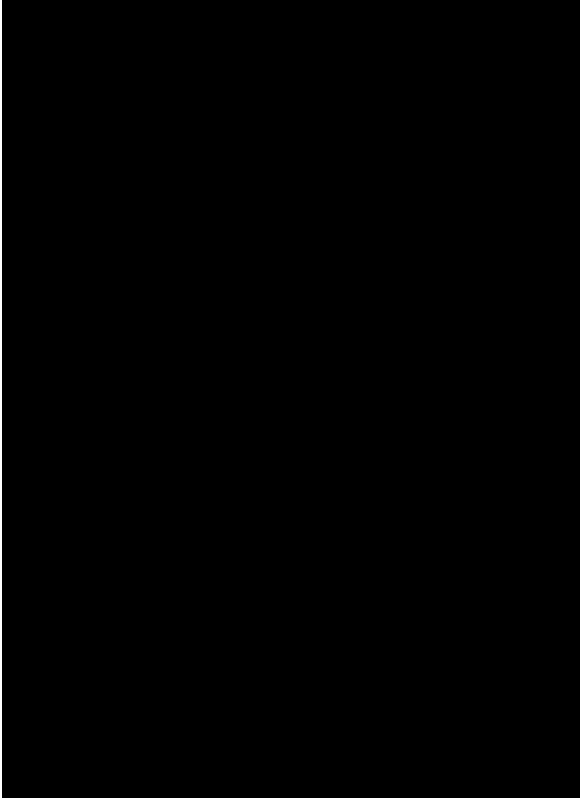
1 what they were doing. It's vague and
2 ambiguous.
3 MR. ACKERMAN: I think that's
4 misstating the question.
5 MR. JONES: Well, I asked you
6 if that was your question, David, and
7 you said yes. I'm not trying to
8 mischaracterize your question.
9 MR. ACKERMAN: I understand
10 that, but the question was not what
11 they were doing. The question is what
12 they were doing to review the
13 information that's listed in the
14 procedure. So --
15 MR. JONES: Okay. All right.
16 MR. ACKERMAN: It's not an
17 argument worth having.
18 MR. JONES: No, I don't want to
19 argue. I'm just trying to make sure
20 the record is clear. I mean, if you
21 want to reask your question, that's
22 fine.
23 MR. ACKERMAN: Don't need to.
24 Let's mark the next document as
25 Exhibit 5.

34 (Pages 130 to 133)

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<p style="text-align: right;">Page 134</p> <p>1 (HenrySchein-Brandt Deposition 2 Exhibit 5 marked.) 3 BY MR. ACKERMAN: 4 Q. Mr. Brandt, the court reporter 5 has handed you what's been marked as 6 Exhibit 5, which I'll represent is a printout 7 from the website LinkedIn -- 8 A. Yes. 9 Q. -- of your profile. 10 A. Yes. 11 Q. Take a moment to review this 12 document and let me know when you've had a 13 chance to review it. 14 A. Okay. 15 (Document review.) 16 A. Okay. 17 BY MR. ACKERMAN: 18 Q. Do you recognize this document? 19 A. Yes. 20 Q. Is this document something that 21 you drafted? 22 A. Yes. 23 Q. Let me direct your attention to 24 the top of the second page. 25 A. Okay.</p>	<p style="text-align: right;">Page 136</p> <p>1 customer service? 2 A. Well, I over -- the people that 3 worked for me helped develop that, so I 4 reviewed it, I'm sure, and yeah. So -- maybe 5 develop isn't a great word, but it was under 6 my -- it was people that were working for me 7 that were part of that. 8 Q. So what did you do to help 9 develop Henry Schein's suspicious order 10 monitoring system and standard operating 11 procedures? 12 A. Just overseeing the manager and 13 the supervisors that were involved in 14 partnering with regulatory to create -- you 15 know, create those documents and create those 16 procedures. 17 Q. Okay. There have been two 18 procedures, Exhibits 3 and Exhibit 4. 19 A. Uh-huh. 20 Q. Were there any other suspicious 21 order monitoring system and standard 22 operating procedures that you helped develop 23 during your tenure as director of customer 24 service? 25 A. No. I don't believe so.</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. And just -- actually, before 2 you do that, stay on the first page. 3 Here it lists the job titles 4 you've held, correct? 5 A. Yes. 6 Q. And then it lists underneath 7 the job titles your responsibilities at each 8 of those job titles, right? 9 A. Yes. 10 Q. And so if you look on page 1, 11 it says Director of Customer Service, right, 12 and that's that position that you held for a 13 long time? 14 A. Uh-huh. 15 Q. And then the description of the 16 responsibilities carries over to page 2. 17 A. Uh-huh. 18 Q. In the second-to-last sentence 19 there says: Helped develop our suspicious 20 order monitoring system and standard 21 operating procedures. 22 Do you see that? 23 A. I do. 24 Q. Is that an accurate description 25 of your job responsibilities as director of</p>	<p style="text-align: right;">Page 137</p> <p>1 Overseeing them and reviewing them when it's 2 done would be more my -- that's kind of more 3 my role. 4 Q. So your role is to make sure it 5 was limited to oversight of the individuals 6 and reviewing the completed work product; is 7 that right? 8 A. Right. I'm not the subject 9 expert, so I rely on the manager and the 10 supervisor to partner with our regulatory 11 team to come up with everything. I would 12 read it to make sure I had a little bit of an 13 understanding of it and to see if there was 14 anything that I -- if I had a question about 15 anything. 16 Q. Okay. 17 A. I trusted the team. 18 MR. ACKERMAN: All right. You 19 can put that one aside. 20 THE WITNESS: Okay. 21 MR. ACKERMAN: Let's mark this 22 next one as Exhibit 6. 23 (HenrySchein-Brandt Deposition 24 Exhibit 6 marked.) 25 ///</p>

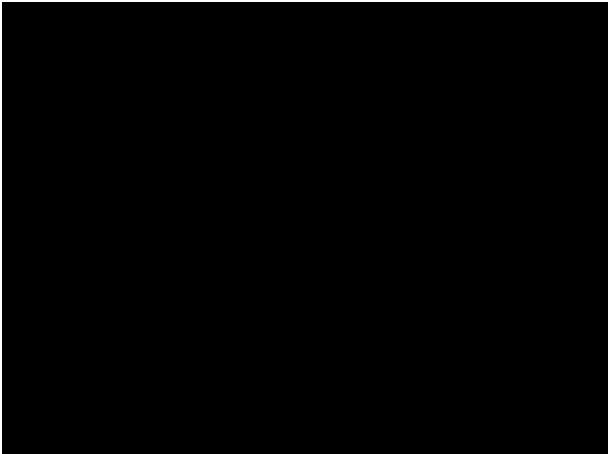
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<p style="text-align: right;">Page 138</p> <p>1 BY MR. ACKERMAN: 2 Q. Mr. Brandt, the court reporter 3 has handed you what's been marked as 4 Exhibit 6. 5 A. Yes. 6 Q. It's a two-page document 7 numbered HSI-MDL_21781 through 21782. Take a 8 moment to review this document and let me 9 know when you've had a chance to review it. 10 A. Sure. Okay. 11 (Document review.) 12 BY MR. ACKERMAN: 13 Q. Have you reviewed it? 14 A. Yes. Yes. 15 Q. Okay. Do you recognize this 16 document? 17 A. It was to me, so I'm -- it was 18 six years ago, so -- but yeah, I -- vaguely, 19 I guess. 20 Q. I understand that your name's 21 on it. 22 A. Yeah. 23 Q. I'm just saying sitting here 24 today, do you recognize the document? 25 A. Yeah. Yeah.</p>	<p style="text-align: right;">Page 140</p> <p>1 then Lisa reported to me. 2 Q. I understand. Okay. Thank 3 you. 4 A. Uh-huh.</p> 
<p style="text-align: right;">Page 139</p> <p>1 Q. All right. 2 A. Seems like a -- yeah.</p>  <p>14 A. Did I have discussions? 15 Q. Uh-huh. 16 A. I'm sure I did. 17 Q. Do you recall any of the 18 discussions? 19 A. No. 20 Q. And at the time Mr. Abreu and 21 Ms. Stratton reported -- reported to you, 22 correct? 23 A. No. I think at the time they 24 reported to -- Shaun reported to Lisa 25 directly, Christine reported to Shaun, and</p>	<p style="text-align: right;">Page 141</p> 

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Page 142

1 Q. Did you have any involvement in
2 determining which orders would be reported to
3 the DEA as suspicious?
4 A. No.
5 MR. ACKERMAN: Let's mark this
6 next one as Exhibit 7.
7 (HenrySchein-Brandt Deposition
8 Exhibit 7 marked.)
9 BY MR. ACKERMAN:
10 Q. Mr. Brandt.
11 A. Yes.




Page 144

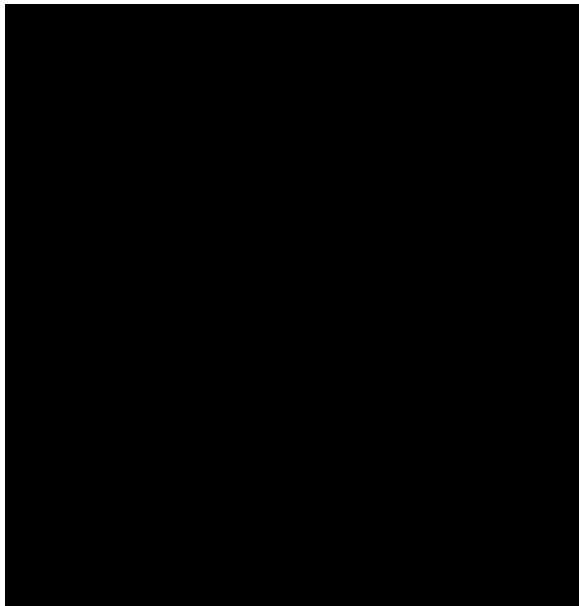
1 Q. A court decision, right?
2 A. A court decision, that's right.
3 Q. Regarding the reporting of
4 suspicious orders of controlled substances,
5 correct?
6 A. That's my understanding, yes.



12 Q. Did you have any discussions
13 with Mr. Abreu about the Masters decision
14 around that time, June of 2018?
15 A. I'm sure we did, yeah. I'm
16 sure we had discussions.
17 Q. Why? Why are you sure that you
18 had discussions?
19 A. It was a relevant -- it was a
20 relevant change and, yeah, I remember
21 discussions with Shaun and with Jim and
22 regulatory to try to figure out how we were
23 going to comply and do what we needed to do.

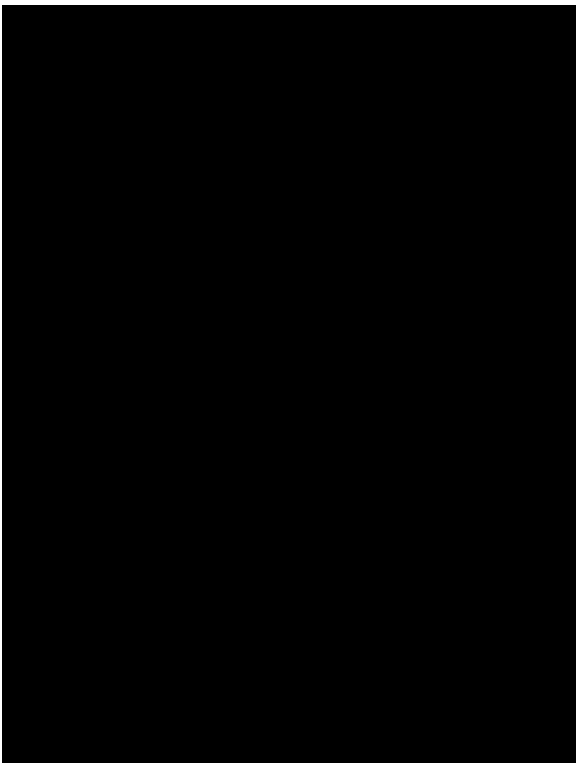


Page 143




20 Q. Okay.
21 A. Uh-huh.
22 Q. Do you have an understanding of
23 what the reference to Masters is?
24 A. It was a decision. It was a
25 court case.

Page 145

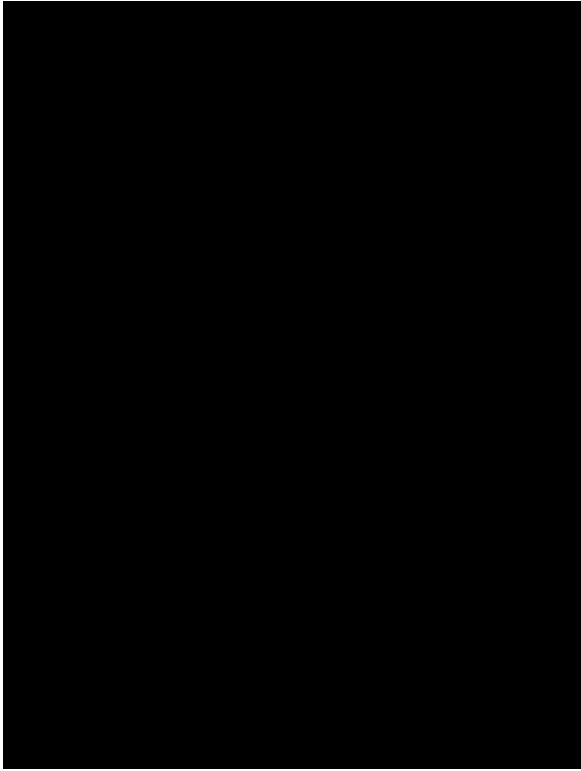


25 Q. Is it your understanding that

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<p style="text-align: right;">Page 146</p> <p>1 prior to October 2017, Henry Schein was not 2 reporting orders when discovered -- 3 suspicious orders when discovered to the DEA? 4 MR. JONES: Object to the form. 5 A. Yeah, I don't know the exact 6 date that we changed, but we did change. I 7 just don't know the date that we formally 8 did -- made that change. 9 BY MR. ACKERMAN: 10 Q. Would Shaun Abreu have been 11 more knowledgeable about the date that 12 Henry Schein made that change? 13 A. Yes, I'm sure he would be. 14 Q. So if in October 2017, Shaun 15 Abreu writes we should start reporting orders 16 when discovered as a result, does that 17 indicate to you that at that time, 18 Henry Schein was not reporting suspicious 19 orders when discovered to the DEA? 20 A. I guess -- 21 MR. JONES: Object to form. 22 A. I don't know. I don't know if 23 we were or not at that time. 24 BY MR. ACKERMAN: 25 Q. Okay.</p>	<p style="text-align: right;">Page 148</p> <p>1 more people on to the verifications 2 department for that process? 3 A. I was -- yeah, I probably 4 worked with Shaun to figure out how we were 5 going to do that. 6 Q. And in what time frame did that 7 effort occur? 8 A. It looks probably 2017 9 sometime. Again, I don't know the exact 10 date.</p>  <p>16 Q. How many more people did the 17 verification department add in order to 18 effect this change in the manner in which 19 Henry Schein was reporting suspicious orders 20 to the DEA? 21 A. I don't remember exactly what 22 we did. I don't remember if we brought 23 somebody new or if we changed a role of an 24 existing person that -- it may have been 25 something to do with that, yeah. And I know</p>
<p style="text-align: right;">Page 147</p> <p>1 A. Yeah. 2 Q. Sitting here today do you know 3 when Henry Schein reports suspicious orders 4 to the DEA? 5 A. When we do? 6 Q. Yes. 7 A. Yes. 8 Q. When? 9 A. When it pends, when the order 10 pends prior to us doing our due diligence. 11 Q. And how is it that you were 12 aware of the procedure now? How did you 13 become aware of that procedure? 14 A. Because it required additional 15 resource and just working with Shaun and 16 regulatory to make sure that we were in 17 compliance with the Masters ruling. 18 Q. How did it require additional 19 resource? 20 A. Just more people for the 21 letters. We have to generate letters and 22 mail them to the local offices, I believe, 23 now. 24 Q. So were you involved in -- I 25 assume it's hiring more people or bringing</p>	<p style="text-align: right;">Page 149</p> <p>1 we did some automation to try to speed up the 2 process a little bit too. 3 Q. Who else was involved in the 4 changes that you're describing to the 5 verifications department? 6 A. It would have been Shaun Abreu. 7 I'm sure Maggie Koromi and Christine 8 Stratton, the supervisors may have been -- 9 may have given ideas or suggestions. And I'm 10 sure regulatory, the regulatory team, I'm 11 sure. 12 Q. Is there a database of 13 suspicious orders at Henry Schein? 14 MR. JONES: Object to the form. 15 A. A database? 16 BY MR. ACKERMAN: 17 Q. Does Henry Schein maintain a 18 list or a collection of the suspicious orders 19 that it had reported to the DEA? 20 MR. JONES: Object to the form. 21 BY MR. ACKERMAN: 22 Q. Does Henry Schein track the 23 suspicious orders that it has reported to the 24 DEA? 25 A. Yes, we keep records, yes.</p>

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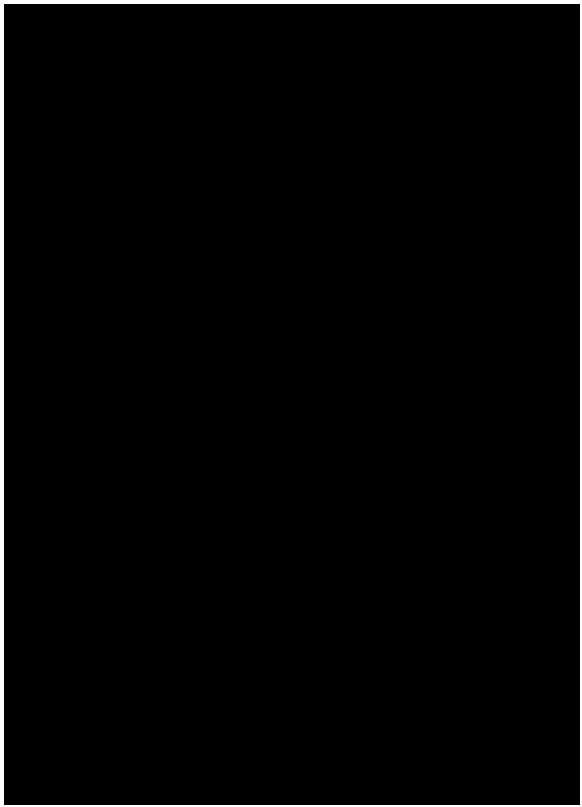
<p style="text-align: right;">Page 150</p> <p>1 Q. And in what form are those 2 records maintained? 3 A. I don't know. 4 Q. Have you personally ever looked 5 up whether a customer was the subject of a 6 suspicious order reported to the DEA? 7 A. Have I ever looked it up in our 8 system? 9 Q. Correct. 10 A. I don't think so, no. 11 Q. Would you know how to do it, if 12 you wanted to? 13 MR. JONES: Object to the form. 14 A. I have visibility -- I have 15 visibility to the pends screens, so I could 16 go in and check an order. I'm not an expert 17 on whether or not it's suspicious or not. 18 BY MR. ACKERMAN: 19 Q. So you can check and see 20 whether an order pended, right? 21 A. (Nods head.) 22 Q. Would that screen indicate 23 whether an order was reported to the DEA? 24 A. No. Not that I -- not that I'm 25 aware.</p>	<p style="text-align: right;">Page 152</p> <p>1 A. In what way? 2 Q. Somebody come to you with a 3 question? 4 MR. JONES: Object to the form. 5 A. Yeah, I'm not an expert on it, 6 so I -- if I did get that type of question, I 7 would probably pretty quickly defer to Shaun 8 or one of the supervisors. 9 BY MR. ACKERMAN: 10 Q. I'm not asking if you're an 11 expert. I'm just trying to find out the 12 nature and extent of your involvement, if 13 any, in the process. 14 A. Yeah. Yeah. It's low. 15 Q. Okay. 16 A. Yeah. 17 MR. ACKERMAN: I suspect these 18 next two exhibits might go pretty 19 quickly. 20 THE WITNESS: Okay. 21 MR. ACKERMAN: Let's mark this 22 one as Exhibit 8. 23 (HenrySchein-Brandt Deposition 24 Exhibit 8 marked.) 25 ///</p>
<p style="text-align: right;">Page 151</p> <p>1 Q. I understand. 2 A. Yeah. 3 Q. If an order pended and then was 4 later cleared as not being suspicious by a 5 member of the verifications department, say, 6 would the pend screen still indicate that the 7 order had pended in the first place? 8 A. Yes. 9 Q. During your time at 10 Henry Schein, have you ever been involved in 11 customer due diligence? 12 A. Have I ever personally been 13 involved in that? 14 Q. Yes. 15 A. I don't think directly. The 16 team -- the team does that. 17 Q. You've overseen the team that 18 performs that aspect, right? 19 A. Right. 20 Q. But you personally have never 21 conducted customer due diligence? 22 A. No, I don't think so, yeah. 23 Q. As part of overseeing the team 24 that conducted the due diligence, were you 25 ever involved in that due diligence process?</p>	<p style="text-align: right;">Page 153</p> <p>1 BY MR. ACKERMAN:</p> 

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Page 154

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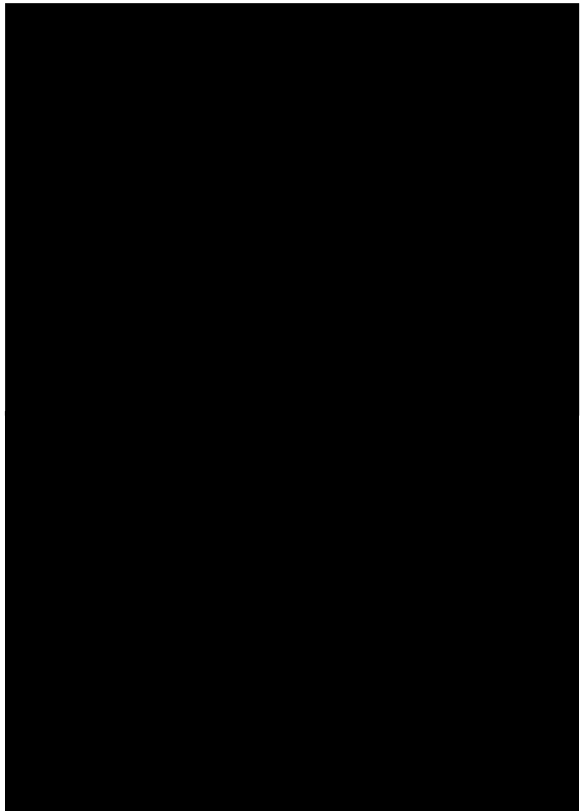
Page 156

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Page 155

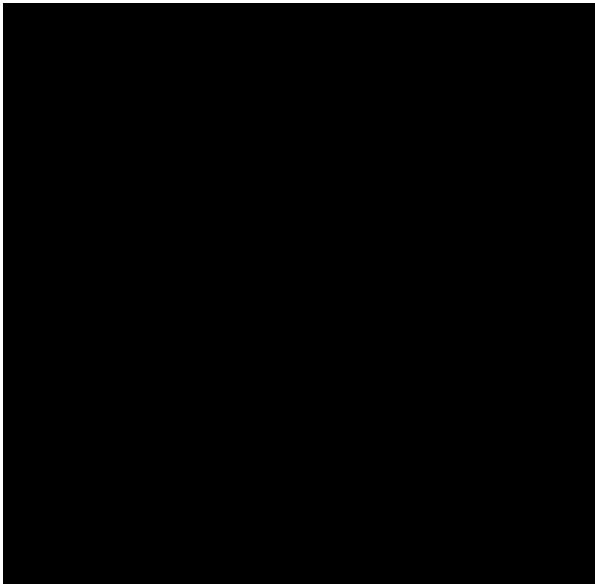
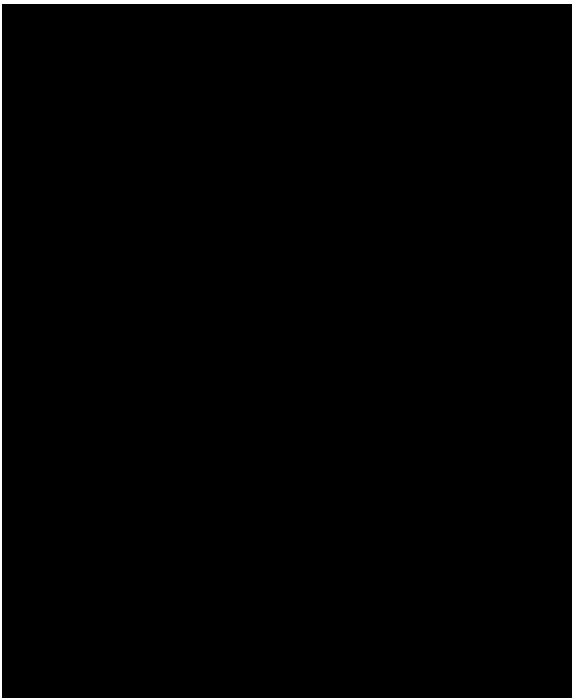
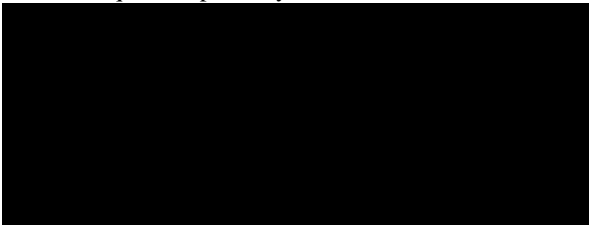
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40 (Pages 154 to 157)

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<p style="text-align: right;">Page 158</p>  <p>19 Q. Thank you. 20 MR. ACKERMAN: You can put that 21 aside. 22 THE WITNESS: Okay. 23 BY MR. ACKERMAN: 24 Q. So we talked earlier about 25 Buzzeo, right?</p>	<p style="text-align: right;">Page 160</p> <p>1 BY MR. ACKERMAN:</p>  <p>24 Q. Do you know who Kathleen Malone 25 is?</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Uh-huh. 2 Q. And remind me again what your 3 understanding as to Buzzeo's role. 4 A. My understanding -- 5 Q. With Henry Schein. 6 Yeah. 7 A. I don't know much about him. I 8 know that he was an ex-DEA guy. What 9 capacity, I'm not sure. And I know that 10 we -- he led some conferences on this topic 11 that Shaun attended and our regulatory team 12 attended, and we contracted with him I 13 believe to create our suspicious order 14 monitoring system or part of it. That's my 15 understanding. 16 Q. Is Buzzeo a person or a 17 company? 18 A. I think both. I don't know for 19 sure, but I think he does have his own 20 company that carries his name. 21 MR. ACKERMAN: Okay. Let me 22 mark this as Exhibit 10. 23 (HenrySchein-Brandt Deposition 24 Exhibit 10 marked.) 25 ///</p>	<p style="text-align: right;">Page 161</p> <p>1 A. I don't believe so. 2 Q. Have you ever spoken with 3 Kathleen Malone? 4 A. Not that I remember, if I did. 5 Q. The answer to the first 6 question probably answered the second.</p>  <p>14 A. Uh-huh, yes. 15 Q. Do you know who Jay Schein RPh 16 is? 17 A. I don't. 18 Q. Do you know anything about the 19 study that's referenced in this letter? 20 A. No, I don't think I -- I don't 21 think I have any specifics about it. 22 Q. Did you ever hear about the 23 study before sitting here today? 24 A. No. 25 Q. Now, just to -- in 2005 had you</p>

41 (Pages 158 to 161)

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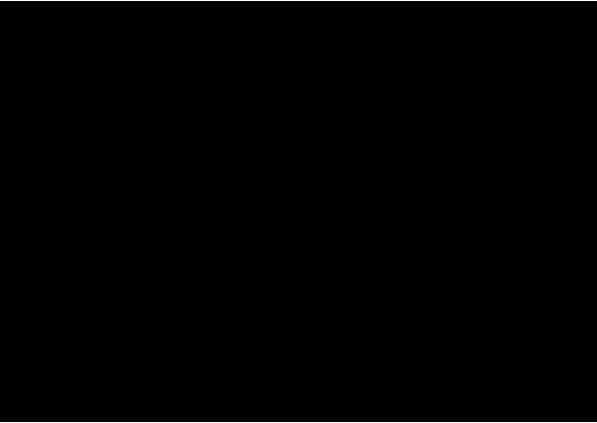
Page 162

1 assumed responsibilities for the verification
2 team?

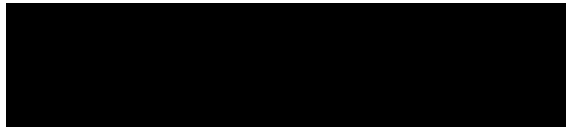
3 A. It's right around that time. I
4 couldn't honestly tell you. It was right in
5 that time frame --

6 Q. Okay.

7 A. -- when I -- I became director,
8 I believe -- what was it, 2003-ish? So
9 Jim -- it was -- Jim -- kind of reported to
10 Jim for a while, and then I took that over.
11 It was right in those years, 2005, '6, or '7,
12 somewhere in that time frame I think I did.



Page 164



5 Q. When you assumed responsibility
6 for the verification department, verification
7 team, was there a formal process in place to
8 assess the appropriateness of the customer's
9 medical practice in relation to the drug
10 product being ordered?

11 MR. JONES: Object to the form.

12 A. Yeah, I don't know.

13 BY MR. ACKERMAN:

14 Q. By the way, there's handwriting
15 on the side of this.

16 A. Uh-huh.

17 Q. Is that your handwriting?

18 A. No.

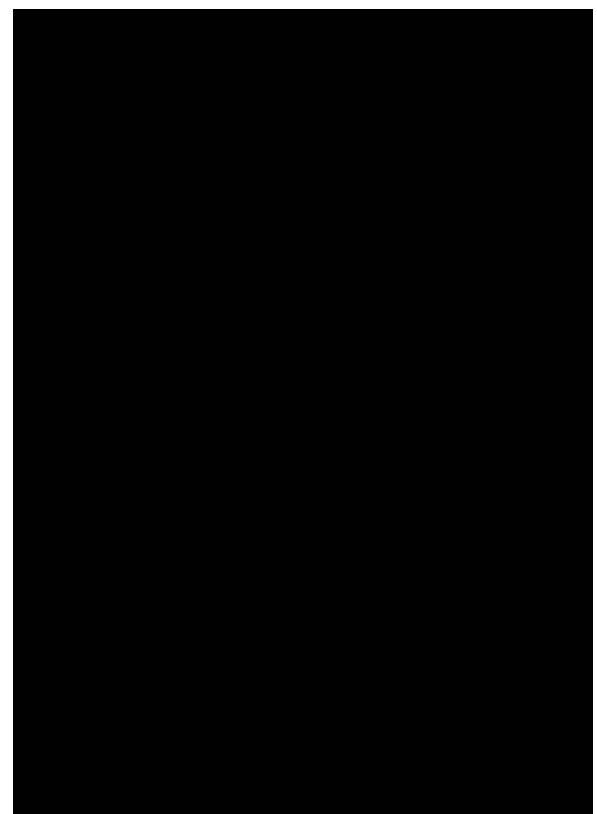
19 Q. Do you recognize the
20 handwriting?

21 A. No.

22 Q. Go to finding number 5, if you
23 would, on page -- it's the page that ends in
24 Bates number 206.

25 A. Okay.

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Page 165

1 Q. And then it says: When an
2 order pends as suspicious, the order and the
3 customer patterns are reviewed. If it still
4 remains suspicious, a letter is sent to the
5 customer requiring an explanation of the
6 order.

7 Do you see that?

8 A. I do.

9 Q. The next sentence says: A
10 pending order will not be released without a
11 return letter from the customer.

12 Is that an accurate description
13 of the process, of the review process for the
14 verification department --

15 MR. JONES: Object to the form.

16 BY MR. ACKERMAN:

17 Q. -- during your tenure?

18 MR. JONES: Object to the form.

19 A. Back at this time?

20 BY MR. ACKERMAN:

21 Q. So let's start with back at
22 this time, sure.

23 MR. JONES: Same objection.

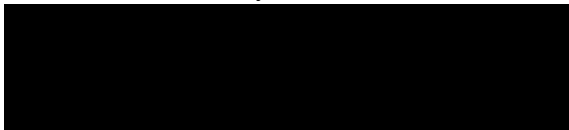
24 A. No. No, I don't know. I don't
25 know.

42 (Pages 162 to 165)

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Page 166

1 BY MR. ACKERMAN:
2 Q. You don't know whether it's
3 accurate?
4 A. I don't know, no.
5 Q. Okay. In 2012, is this an
6 accurate description of the -- let me ask the
7 question this way.
8 In 2012, if following a review
9 the record still remains suspicious, did the
10 verification team send a letter to the
11 customer requiring an explanation of the
12 order?
13 MR. JONES: Object to the form,
14 misleading.
15 A. I don't know. I don't know
16 that.
17 BY MR. ACKERMAN:
18 Q. Take a look at Exhibit 3.
19 A. Okay.
20 Q. And go to page 6 of Exhibit 3.
21 A. Okay.

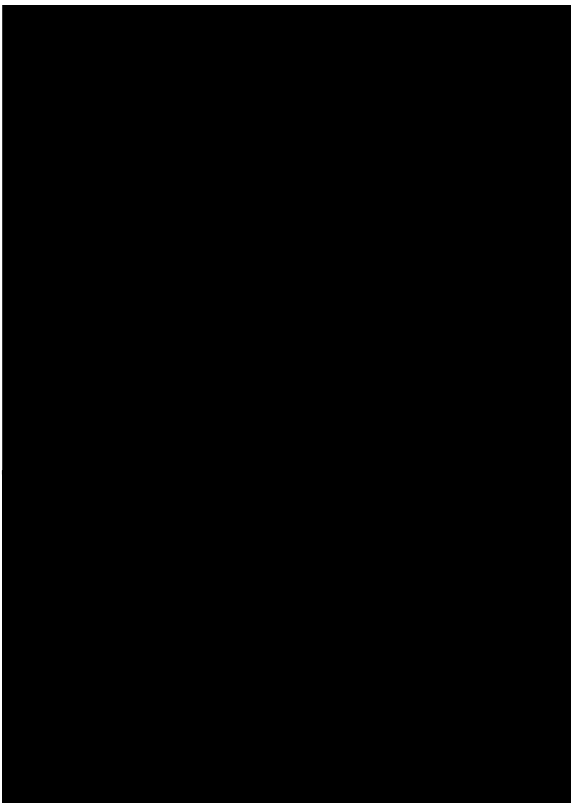


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1 Q. Are you aware of any change in
2 procedure between 2005 and 2012 concerning
3 requiring that a customer explain or justify
4 an order?
5 MR. JONES: Object to the form.
6 A. I don't know. Our -- the
7 procedures evolve, so...
8 BY MR. ACKERMAN:
9 Q. Okay.
10 A. Yeah.

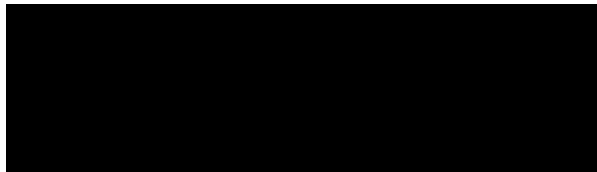


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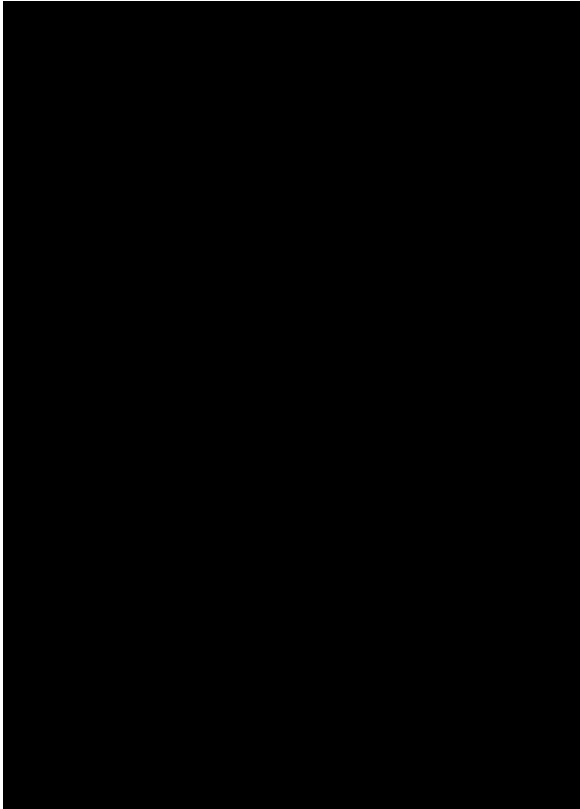
15 THE WITNESS: Okay.
16 MR. ACKERMAN: Let's mark this
17 as Exhibit 11.
18 (HenrySchein-Brandt Deposition
19 Exhibit 11 marked.)
20 BY MR. ACKERMAN:



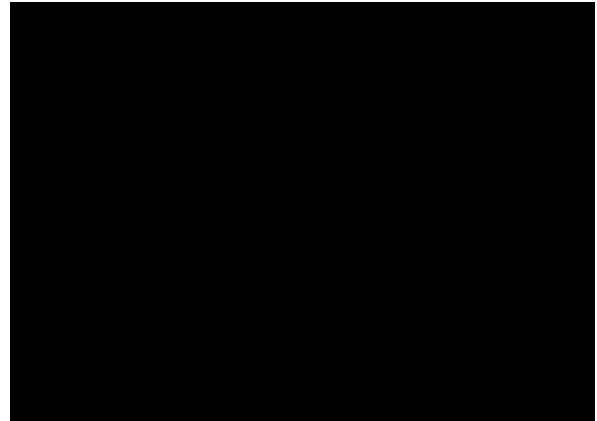
43 (Pages 166 to 169)

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14 Q. You oversaw the verifications
15 department at this time, right?

16 A. I don't know.

17 Q. In 2008?

18 A. Right around that time.

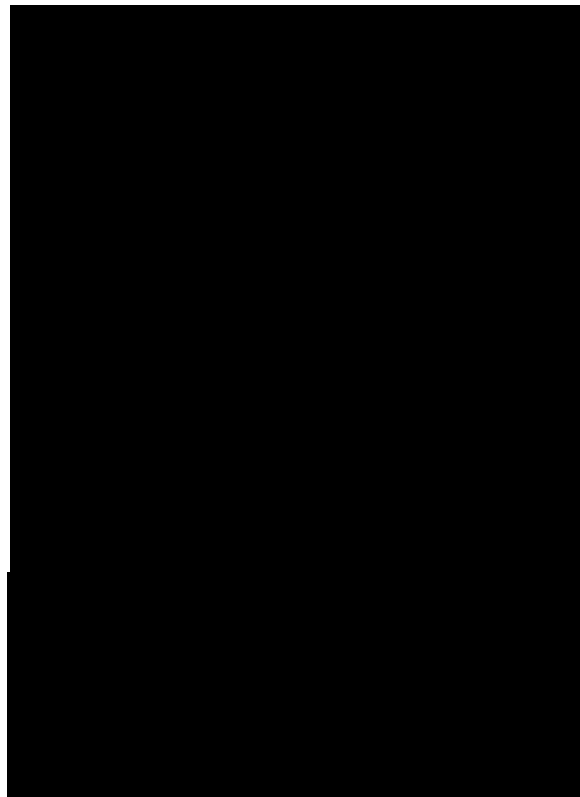
19 Q. Okay.

20 A. Yeah, I may have. I may not
21 have.

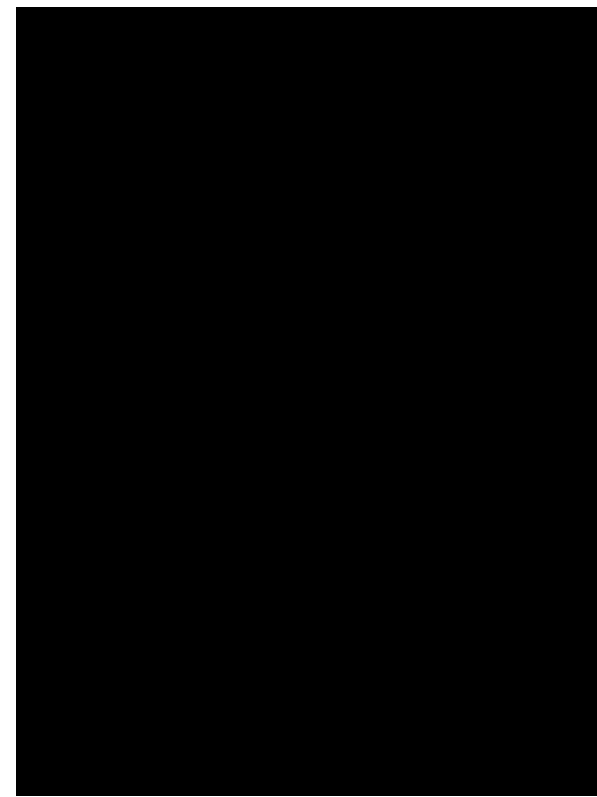
22 Q. Were you in part of this
23 smaller workgroup?

24 A. I don't recall if I was. I may
25 have been. I honestly don't recall.

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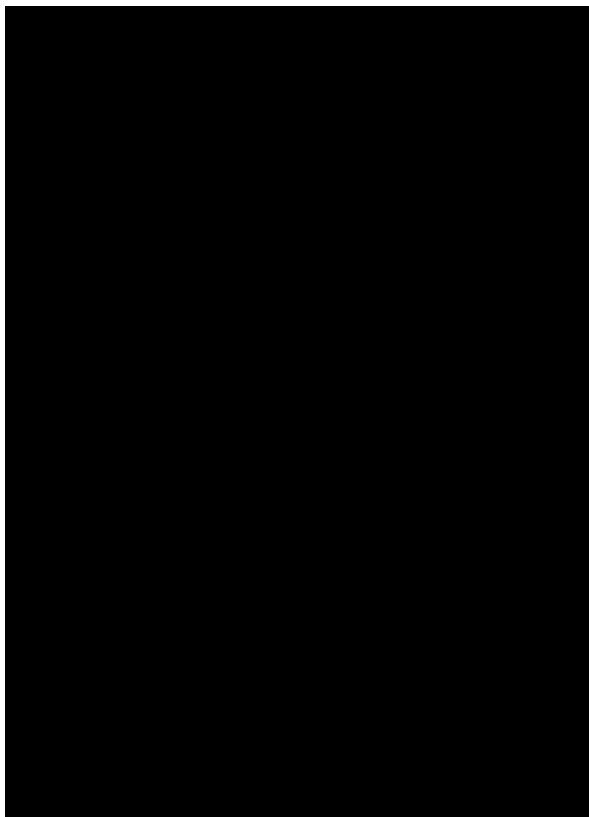
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44 (Pages 170 to 173)

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1 Q. Okay. Were you involved in
2 changes to the procedures of the verification
3 department that -- well, strike that. Let me
4 ask the question differently.

5 Were you involved in any
6 discussions following this meeting concerning
7 changes to the verification department's
8 procedures as a result of the discussions in
9 this meeting?

10 A. Probably. I probably was. I
11 was an attendee. I was part of the group, so
12 I --

13 Q. Do you recall any of those
14 discussions?

15 A. Not specifically, no.

16 Q. All right. Do you recall
17 whether anyone disagreed with the
18 recommendations of Cegedim Dendrite as
19 reflected in the document?

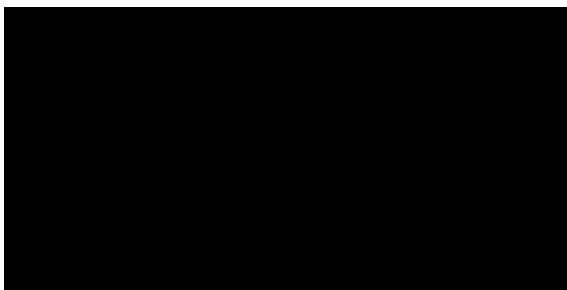
20 A. I don't.

21 Q. Did you have any opinion
22 regarding the recommendations of Cegedim
23 Dendrite?

24 A. Did I at the time?

25 Q. Yes.

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10 Q. Prior to this meeting, did the
11 verification department speak with someone
12 other than the physician or their registrant
13 when placing telephone calls to the
14 physician's office regarding controlled
15 substance ordering procedures?

16 A. I don't know. I don't know.

17 Q. Independent of what's in this
18 Exhibit 11, do you remember any discussion
19 that occurred at this meeting?

20 A. No.

21 Q. Okay. Do you -- I didn't mean
22 to cut you off if you were going to say
23 something.

24 A. No, I wasn't going to say
25 something.

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1 A. I don't recall if I did. I may
2 have.

3 Q. Okay.

4 MR. JONES: Since you're
5 getting between exhibits, can we
6 break?

7 MR. ACKERMAN: Yeah, it's a
8 good time. Let's take a break.

9 THE VIDEOGRAPHER: The time is
10 now 2:00 p.m. Going off the record.
11 (Recess taken, 2:00?p.m. to
12 2:16?p.m.)

13 THE VIDEOGRAPHER: The time is
14 now 2:16. Back on the record.

15 MR. ACKERMAN: Let's mark this
16 one as Exhibit 12.

17 (HenrySchein-Brandt Deposition
18 Exhibit 12 marked.)

19 BY MR. ACKERMAN:

20 Q. Mr. Brandt, the court reporter
21 has handed you what's been marked as
22 Exhibit 12.

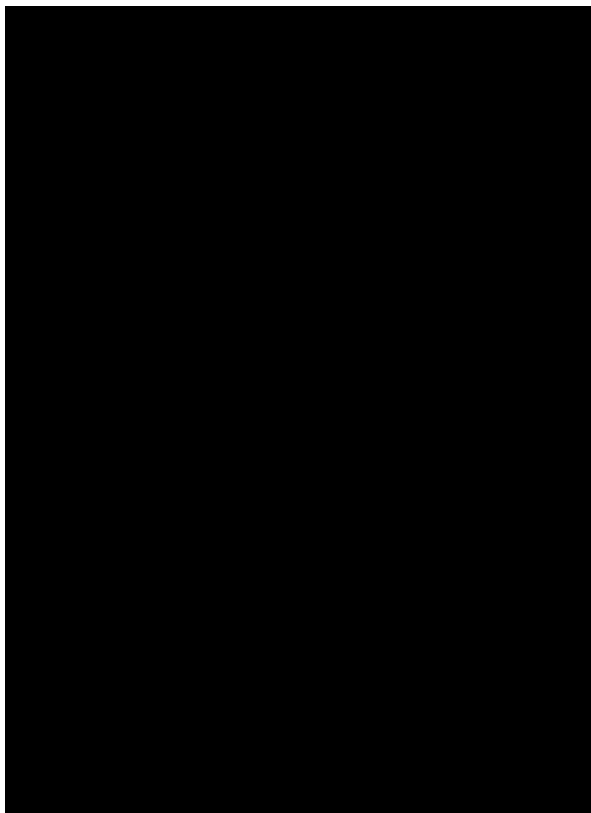
23 A. Uh-huh.



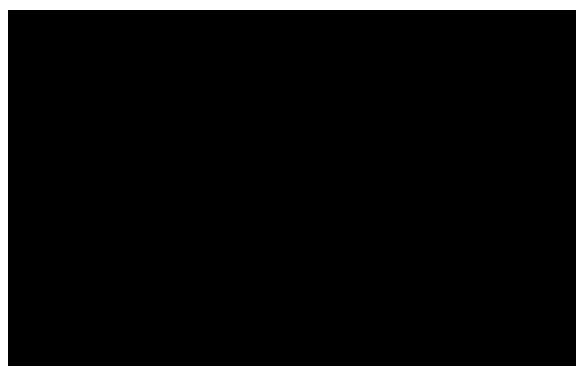
45 (Pages 174 to 177)

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12 Q. Were customer -- did
13 Henry Schein provide customers with a
14 document with information pertaining to
15 controlled substances that addressed basic
16 legal issues such as legitimate medical use?

17 MR. JONES: Object to the form.

18 A. I don't know.

19 BY MR. ACKERMAN:

20 Q. At any point during the period
21 at which you oversaw the verifications
22 department, did representatives conduct
23 background investigations on new customers to
24 determine whether those customers were the
25 subject of any convictions or regulatory

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1 actions?

2 A. Yes.

3 Q. Was that the practice
4 throughout the entire period?

5 A. That, I don't know.

6 Q. Okay. And how do you know that
7 those investigations were conducted?

8 A. Speaking with Shaun and the
9 regulatory team.

10 Q. At any point during your tenure
11 where you oversaw the verifications
12 department, the licensing department -- just
13 to be clear, when I say verifications
14 department, I understand that to also refer
15 to the licensing department. Do you
16 understand that the same way?

17 A. I do. I do.

18 Q. Okay. I just want to make sure
19 that I didn't need to revisit a couple of
20 hours of questions.

21 MR. JONES: I'm sure we can
22 reach a stipulation.

23 MR. ACKERMAN: Yeah.

24 BY MR. ACKERMAN:

25 Q. So at any point during your

46 (Pages 178 to 181)

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1 tenure of overseeing the verification
2 department, did representatives conduct
3 onsite visits as part of their due diligence
4 efforts with respect to Henry Schein
5 customers?

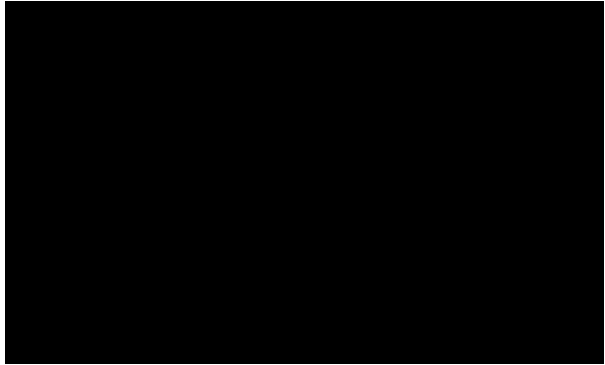
6 A. None of -- none of our
7 representatives. I don't believe any of our
8 representatives ever did.

9 MR. ACKERMAN: Okay. This
10 might be the last one on this topic.

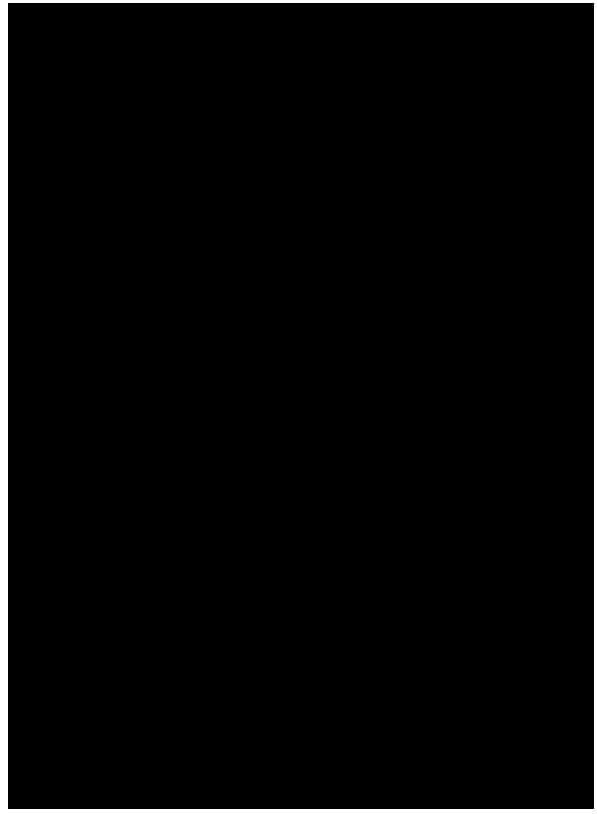
11 Let's mark this as Exhibit 13.

12 (HenrySchein-Brandt Deposition
13 Exhibit 13 marked.)

14 BY MR. ACKERMAN:



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14 Q. First of all, the customer
15 service department was you. You were the
16 director of the customer service department
17 at this time; is that correct?

18 A. That's right, yes.

19 Q. You heard the use of the word
20 "gatekeepers" --

21 A. Yes.

22 Q. -- to describe individuals in
23 the customer service department?

24 And in what manner is that term
25 used at Henry Schein?

47 (Pages 182 to 185)

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1 A. The gatekeepers are a small
2 group within the customer service team, and
3 they are responsible for the database
4 management, changes to account numbers,
5 changes to addresses, changes to phone
6 numbers, and initial vetting of new accounts
7 that get set up in the system, like it says
8 here.

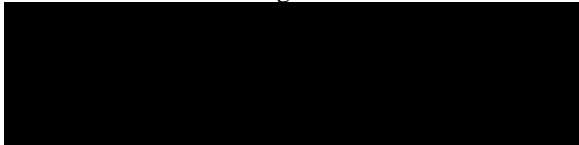
9 Q. Okay. In terms of initial
10 vetting of new accounts, what is it that the
11 gatekeeper -- first of all, are there still
12 gatekeepers today at Henry Schein?

13 A. Yes.

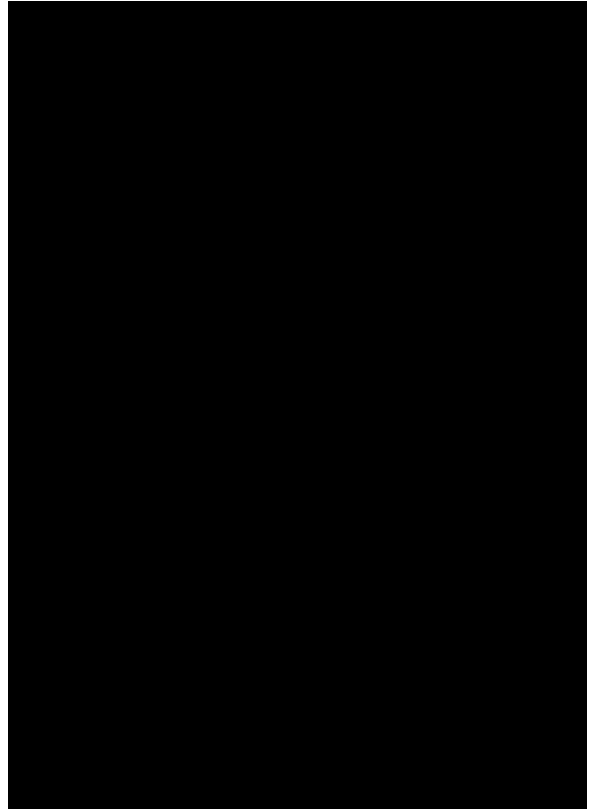
14 Q. Are those gatekeepers -- do
15 those gatekeepers still have responsibility
16 for initial vetting of new accounts today?

17 A. Yeah, reviewing new accounts,
18 yeah.

19 Q. In 2009 what were the
20 gatekeepers' responsibility with respect to
21 the initial vetting of new accounts?



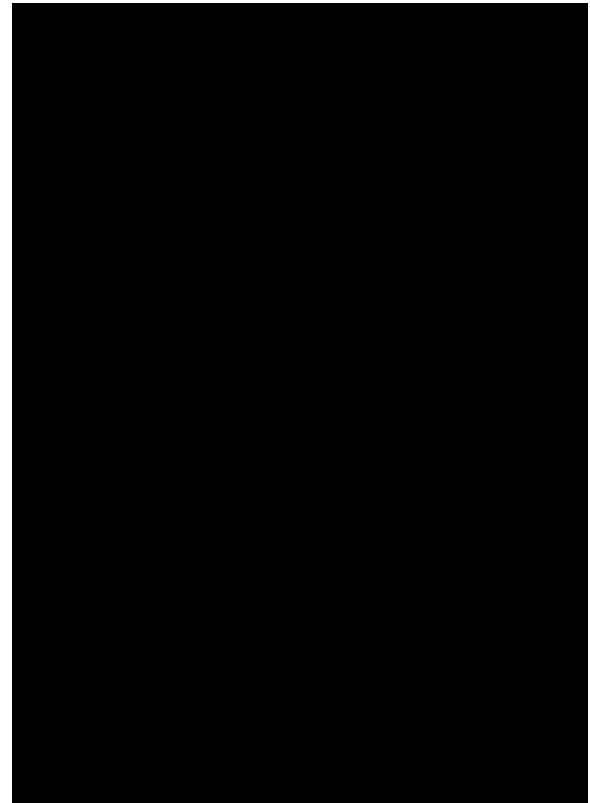
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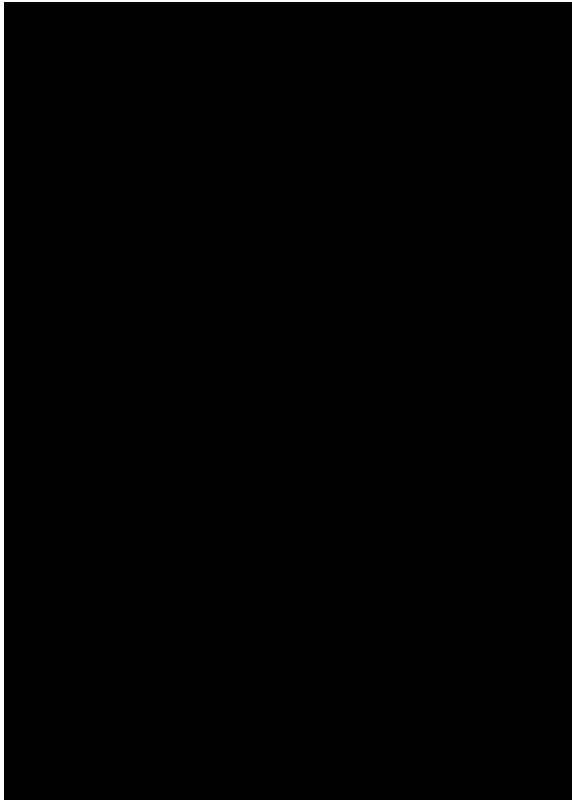
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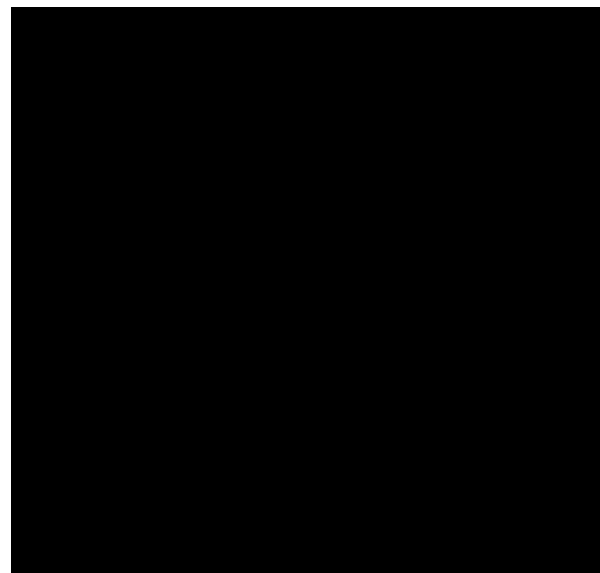
48 (Pages 186 to 189)

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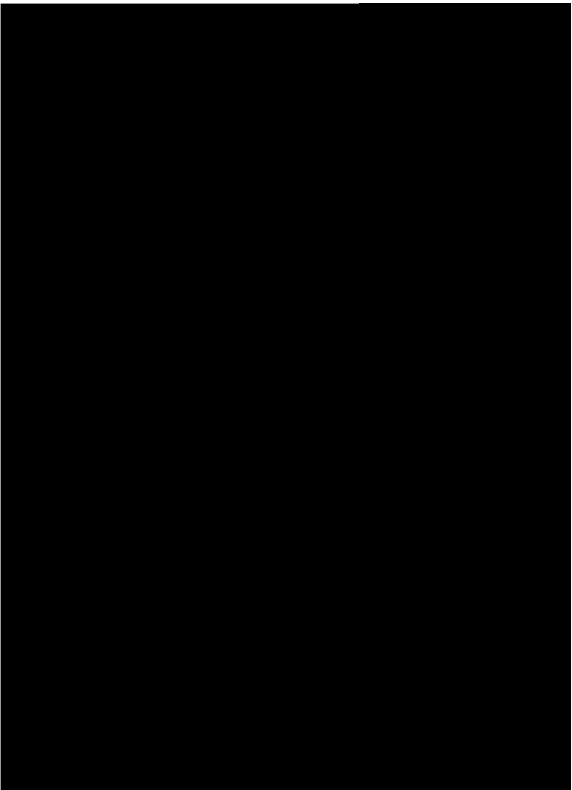


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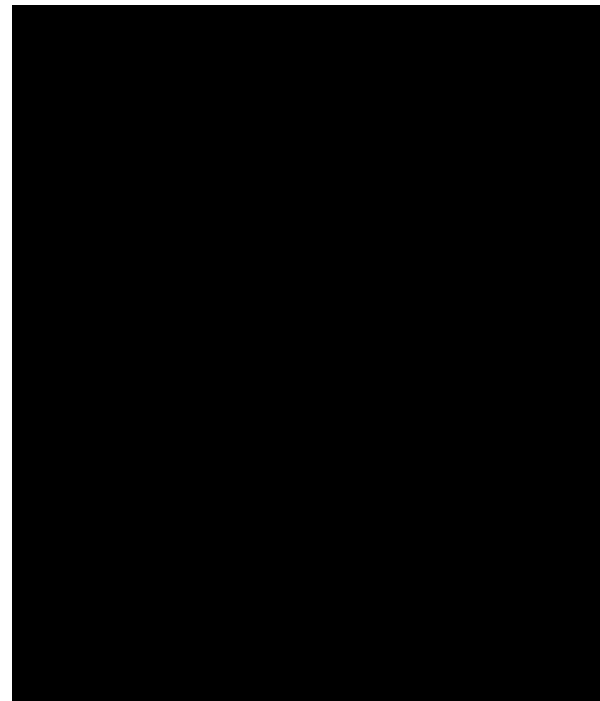
19 MR. JONES: Object to the form.
20 A. I don't recall seeing it.
21 MR. ACKERMAN: Okay. You can
22 put that one aside.
23 Let's mark this Exhibit 14.
24 (HenrySchein-Brandt Deposition
25 Exhibit 14 marked.)

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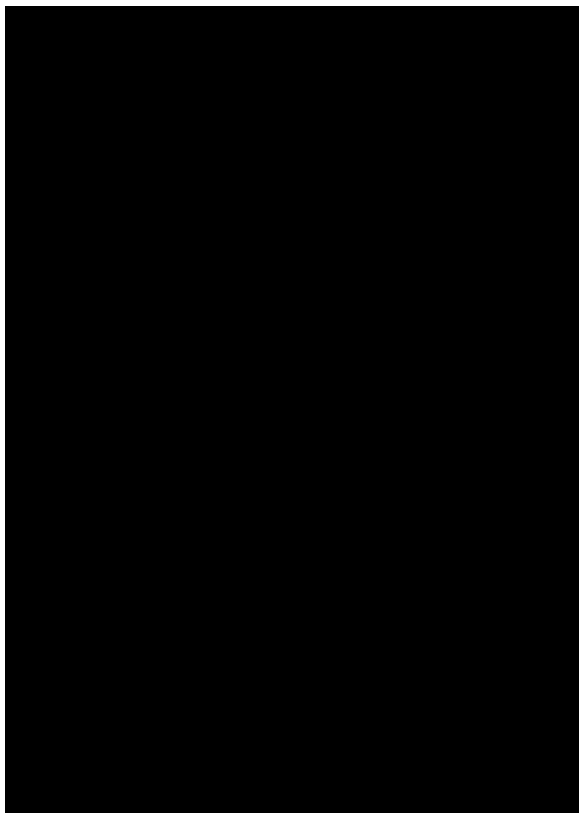
1 BY MR. ACKERMAN:
2 Q. Mr. Brandt.
3 A. Yes.



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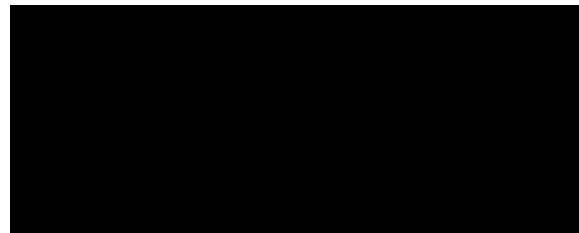
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1 this presentation, who it was given to, so
2 no. But I don't recall being told that.
3 Q. Okay. Were you ever involved
4 in an effort to generate or conduct due
5 diligence for a large number of existing
6 Henry Schein customers?
7 A. Yes.
8 Q. And when was that?
9 A. I don't recall the exact dates.
10 Q. Was it more than ten years ago?
11 A. Probably not.
12 Q. All right. So it was within
13 the last ten years?
14 A. Yes.
15 Q. Was it after 2012, within the
16 last five years?
17 A. Possibly, yes.
18 Q. And that was two different time
19 periods because my math was bad again, so let
20 me try that again.
21 Was it within the past five
22 years?
23 A. Yeah, I don't recall the exact
24 dates.
25 Q. Okay. And what is it that you

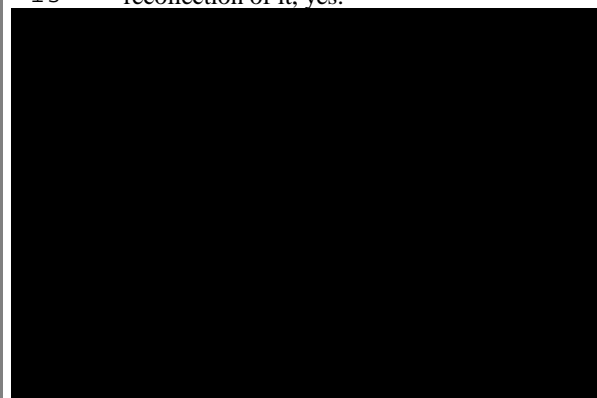
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8 Q. What department at Henry Schein
9 was responsible for conducting Know Your
10 Customer due diligence?
11 A. The license verifications team.
12 Q. And what department at
13 Henry Schein was responsible for maintaining
14 the Know Your Customer due diligence files at
15 Henry Schein?
16 A. The license verifications team.
17 Q. And you oversaw the license
18 verification team?
19 A. Yes.
20 Q. Does it strike you as odd that
21 no one ever mentioned to you that
22 Henry Schein did not have Know Your Customer
23 due diligence files for approximately 60% of
24 its customers?
25 A. No, I don't know the context of

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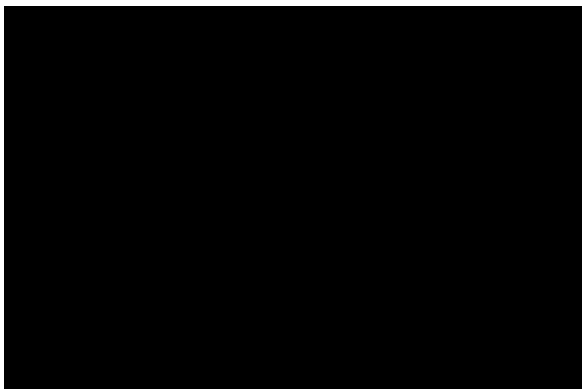
1 recall about that effort?
2 A. I recall Shaun and the -- and
3 our team working with the regulatory team,
4 the team that Tina was on, to identify
5 accounts that they believed required
6 additional due diligence and a plan to
7 address that.
8 Q. Were you part of that effort?
9 A. I don't believe so.
10 Q. You were just aware that it was
11 occurring?
12 A. That's my -- that's my
13 recollection of it, yes.



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13 Q. Okay. Putting aside whether
 14 you participated in those conversations, are
 15 you aware of any conversations that occurred
 16 regarding that topic?
 17 A. At what level? I'm not sure I
 18 understand the question.
 19 Q. At any level. Did you ever
 20 hear --
 21 MR. JONES: Object to the form.
 22 A. No, I don't recall that --
 23 BY MR. ACKERMAN:
 24 Q. Did you hear that people at
 25 Henry Schein were concerned that they were --

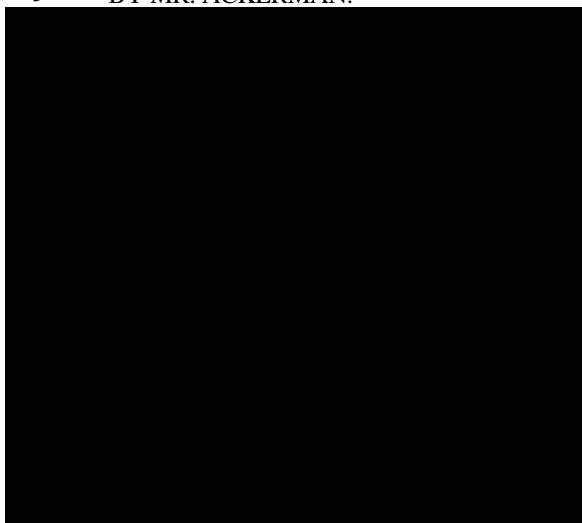
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4 Q. Were you involved in any
 5 efforts to amass additional resources in
 6 order to prepare, review and complete
 7 customer due diligence?
 8 A. Not that I recall, and
 9 regulatory didn't fall under my scope,
 10 doesn't fall under my scope.
 11 Q. But due diligence was performed
 12 by the verification department, correct?
 13 A. Uh-huh, yes.
 14 Q. And that was within your scope?
 15 A. Yes.
 16 Q. You mentioned that you were
 17 aware that Mr. Abreu and the regulatory team
 18 were undergoing an effort to identify
 19 accounts that required additional due
 20 diligence?
 21 A. Uh-huh.
 22 Q. How long did that effort last?
 23 A. Oh, I don't recall the exact
 24 time, the time frame.
 25 Q. Did that effort identify any

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1 they were vulnerable to DEA regulatory action
 2 because of the status of due diligence files
 3 on customers purchasing controlled
 4 substances?
 5 MR. JONES: Object to the form,
 6 mischaracterizes the document.
 7 A. I don't recall. I don't recall
 8 that.
 9 BY MR. ACKERMAN:





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1 problem customers?
 2 A. I don't recall specifically.
 3 Q. Understanding you may not
 4 recall the exact time frame of how long the
 5 effort lasted, do you recall generally the
 6 time frame?
 7 A. I don't. I don't.
 8 Q. Was it more than a year?
 9 MR. JONES: Objection, form,
 10 asked and answered.
 11 A. Yeah, I don't recall if it was
 12 longer than a year.
 13 BY MR. ACKERMAN:
 14 Q. Okay. Was it longer than six
 15 months?
 16 MR. JONES: Objection, form,
 17 asked and answered. He's already told
 18 you that he doesn't have any specific
 19 understanding or recollection.
 20 A. Yeah, I don't recall.
 21 MR. ACKERMAN: And I'm probing
 22 it.
 23 MR. JONES: I know. But he's
 24 already answered your question, David.
 25 MR. ACKERMAN: That's fine.

51 (Pages 198 to 201)

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<p style="text-align: right;">Page 202</p> <p>1 Just say objection to form.</p> <p>2 BY MR. ACKERMAN:</p> <p>3 Q. Was it longer than six months?</p> <p>4 MR. JONES: Objection, form,</p> <p>5 asked and answered twice.</p> <p>6 A. I don't recall if it was.</p> <p>7 BY MR. ACKERMAN:</p> <p>8 Q. Was it longer than a month?</p> <p>9 MR. JONES: Objection, form,</p> <p>10 bordering on harassing.</p> <p>11 A. I don't recall.</p> <p>12 MR. ACKERMAN: Let's mark this</p> <p>13 next one as Exhibit 15.</p> <p>14 (HenrySchein-Brandt Deposition</p> <p>15 Exhibit 15 marked.)</p> <p>16 BY MR. ACKERMAN:</p> 	<p style="text-align: right;">Page 204</p> <p>1 A. Len David.</p> <p>2 Q. And what position did Len David</p> <p>3 have in 2014?</p> <p>4 A. I believe he was our chief</p> <p>5 compliance officer.</p> <p>6 Q. J. Peacock?</p> <p>7 A. Jeff Peacock.</p> <p>8 Q. And what position did</p> <p>9 Jeff Peacock hold in 2014?</p> <p>10 A. Regulatory, may have been</p> <p>11 director.</p> <p>12 Q. Okay.</p> <p>13 Mr. Mullins, I think we've</p> <p>14 discussed. Mr. Tejeda. The next one is you,</p> <p>15 right?</p> <p>16 A. Yes.</p> <p>17 Q. L. Matalon?</p> <p>18 A. Lisa Matalon was the manager of</p> <p>19 customer service at that time.</p> <p>20 Q. The next one is Mr. Abreu,</p> <p>21 correct?</p> <p>22 A. Yes, Shaun reported to Lisa.</p> <p>23 Lisa reported to me.</p> <p>24 Q. Okay. And then the last one is</p> <p>25 K. Romeo?</p>
<p style="text-align: right;">Page 203</p>  <p>12 Q. And did you attend this</p> <p>13 meeting?</p> <p>14 A. I believe I did. I'm listed as</p> <p>15 an attendee.</p> <p>16 Q. Do you recall attending the</p> <p>17 meeting?</p> <p>18 A. I don't recall if I attended.</p> <p>19 Q. All right. Some of the</p> <p>20 attendees I think we've identified here, but</p> <p>21 I just want to make sure that I understand</p> <p>22 who they are.</p> <p>23 A. Okay.</p> <p>24 Q. The first one listed is</p> <p>25 L. David?</p>	<p style="text-align: right;">Page 205</p> <p>1 A. Ken Romeo.</p> <p>2 Q. Who was that?</p> <p>3 A. Ken was a regulatory associate</p> <p>4 based out of Reno.</p> <p>5 Q. And the minutes were prepared</p> <p>6 by Tina Steffanie-Oak?</p> <p>7 A. Yes.</p> <p>8 Q. Do you recall any of the</p> <p>9 discussion at this meeting?</p> <p>10 A. Not specifically, no.</p> <p>11 Q. Okay. Do you recall just</p> <p>12 generally?</p> <p>13 A. Generally, yeah.</p> <p>14 Q. What do you recall?</p> <p>15 A. Just reviewing her findings and</p> <p>16 listening to the opportunities and discussing</p> <p>17 at a high level, you know, plans of action,</p> <p>18 things that, you know, we would do.</p> <p>19 Q. Who did most of the talking?</p> <p>20 A. Tina Steffanie-Oak and</p> <p>21 Ken Romeo would.</p> <p>22 Q. Was Ms. Steffanie-Oak tasked</p> <p>23 with conducting an audit of the --</p> <p>24 Henry Schein's SOM system?</p> <p>25 A. I don't recall.</p>

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19 Do you see that?

20 A. I do.

21 Q. Do you recall any specific
22 discussion regarding the fact that the
23 current -- that Henry Schein's current SOM
24 system was dated?

25 A. Nothing other than general

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1 believe.

2 Q. How long had he been the
3 supervisor of the verifications department?

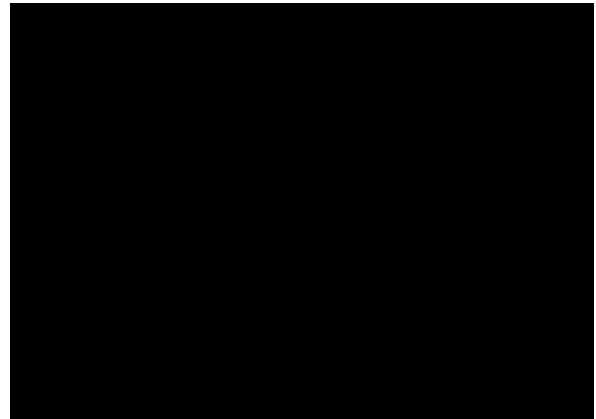
4 A. I believe about four or five
5 years.

6 Q. What department at Henry Schein
7 was responsible for the computerized
8 suspicious order monitoring system?

9 A. Regulatory.

10 Q. They were responsible for
11 designing it?

12 A. Yeah, I believe.



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1 discussion. I don't remember any specifics
2 of it.

3 Q. Were you involved in any
4 efforts following this meeting to update
5 Henry Schein's computerized suspicious order
6 monitoring system?

7 A. Just on an oversight level.
8 Shaun -- Shaun and Lisa would have been more
9 into the details of that.

10 Q. Okay. At this point in 2014,
11 how long had Lisa Matalon been the manager of
12 the -- was she the manager of the customer
13 service division or of the verifications
14 department?

15 A. Both.

16 Q. Okay.

17 A. Yeah.

18 Q. So in 2014, how long had
19 Lisa Matalon been the manager of the
20 verifications department?

21 A. Five years.

22 Q. And in 2014, what was
23 Mr. Abreu's title with respect to the
24 verification department?

25 A. Verifications supervisor, I

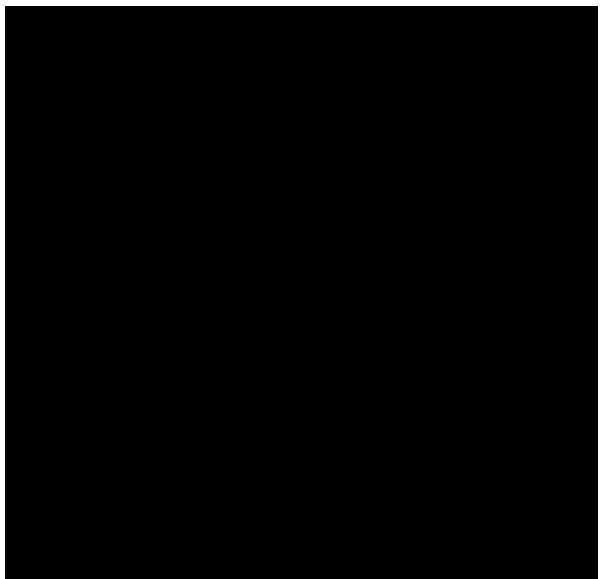
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1 Q. So my first question: Do you
2 recall any discussion at the meeting
3 concerning this topic?

4 A. I don't. Nothing -- not
5 specifically, no.

6 Q. Okay.

7 A. No.



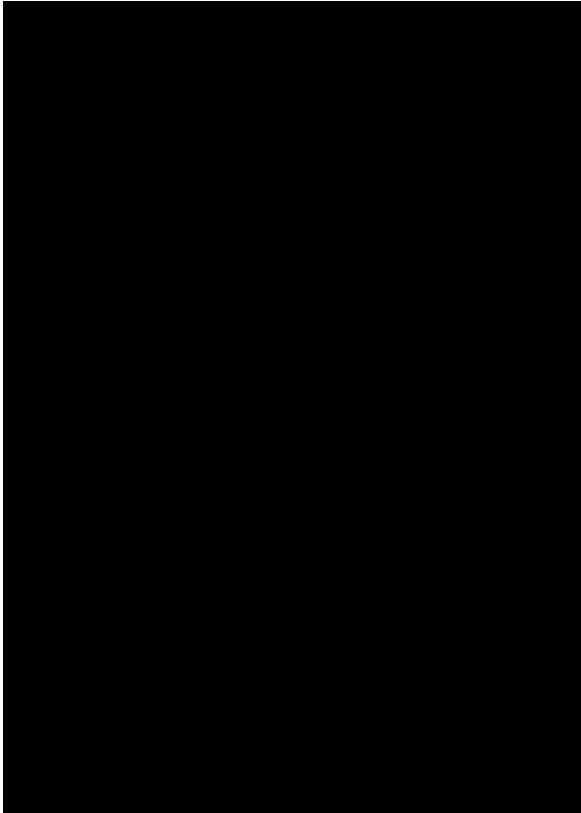
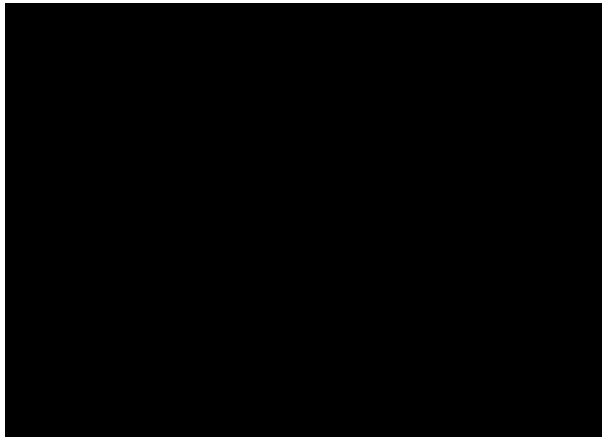
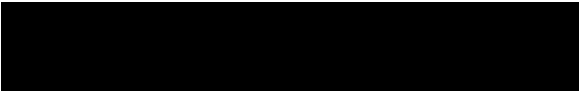
53 (Pages 206 to 209)

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<p style="text-align: right;">Page 210</p> <div style="background-color: black; width: 350px; height: 40px; margin-bottom: 10px;"></div> <p>4 Q. Was there any discussion as to 5 who the decision-makers in the verifications 6 department were? 7 A. I'm sorry, can you repeat it? 8 Q. Sure. So the word 9 "decision-makers" is in quotes there, right? 10 A. Right, uh-huh. 11 Q. Was there discussion during 12 this meeting as to who the decision-makers in 13 the verification -- who were the 14 decision-makers in the verifications 15 department? 16 A. Yeah, that -- that's a title, 17 so it's a job title, the SOM decision-makers. 18 I don't recall exactly who they were in 2014, 19 but it was probably a handful of 20 representatives. 21 Q. And how are the decision-makers 22 different from representatives in the 23 verifications department? 24 A. Their role. The role of their 25 position is different.</p>	<p style="text-align: right;">Page 212</p> <p>1 Q. So if the decision-makers were 2 reviewing the completed questionnaires, what 3 were the verifications department 4 representatives doing? 5 A. Reviewing orders that were 6 pending in our system, but it may not have -- 7 may or may not have included a controlled 8 substance. May have just been an Rx item, 9 may have been a -- it may have had a 10 controlled substance; it may have not. 11 Q. Okay. Then there's a reference 12 here to -- so before we move on to there: 13 Did the decision-makers in the verifications 14 department ever receive additional 15 medical-related training to release 16 controlled substances orders? 17 A. Yes. 18 Q. When was that? 19 A. I don't recall the exact date. 20 Q. And what training did they 21 receive? 22 A. It was a presentation from -- 23 that Ken Romeo put together. 24 Q. And was Mr. Romeo the one who 25 presented that presentation to the</p>
<p style="text-align: right;">Page 211</p> <p>1 Q. So there -- if I understand the 2 verifications department, there are 3 representatives and then there are 4 decision-makers? 5 A. Yes. 6 Q. Was that the case throughout 7 your entire tenure overseeing the 8 verifications department? 9 A. No. 10 Q. And when did the verifications 11 department create the decision-maker role? 12 A. When we implemented the 13 questionnaire. 14 Q. In what way -- what 15 responsibilities did the decision-makers have 16 that differentiated them from regular 17 representatives in the verifications 18 department? 19 A. I couldn't -- I couldn't 20 specify with any degree of accuracy. That 21 would have been Shaun and Lisa's expertise. 22 Q. Were the decision-makers the 23 ones who reviewed the completed 24 questionnaires that came in from customers? 25 A. Yes.</p>	<p style="text-align: right;">Page 213</p> <p>1 verifications department? 2 A. Yes. Yes. 3 Q. Did you attend that 4 presentation? 5 A. I don't -- I don't believe I 6 did. I don't believe I attended his. 7 Q. Were the decision-makers 8 located in both Melville and Reno, or were 9 they only in one location as opposed to the 10 other? 11 A. At this time? 12 Q. Yes. 13 A. I believe only in Melville. 14 Q. Is Henry Schein's headquarters 15 in Melville? 16 A. Yes. 17 Q. Did Mr. Romeo -- Mr. Romeo's 18 medical training presentation, how many times 19 did he give that presentation? 20 A. Gosh, I don't recall if he did 21 the entire team in one sitting. He probably 22 didn't, so -- because we had to cover the 23 phones, so probably multiple times in each 24 location. 25 Q. Was it a regular presentation</p>

54 (Pages 210 to 213)

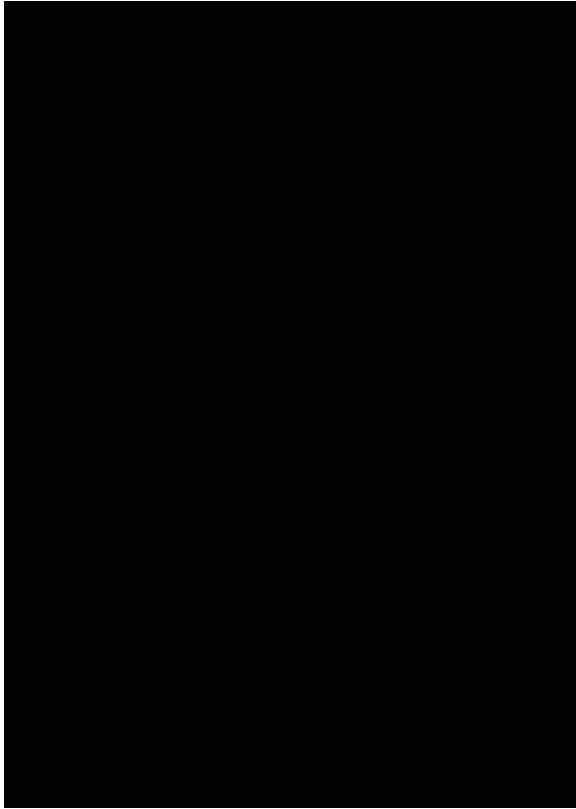
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<p style="text-align: right;">Page 214</p> <p>1 that occurred, you know, every six months, or</p> <p>2 was it just done multiple times in a</p> <p>3 relatively short time span?</p> <p>4 A. I don't know. I don't recall.</p> <p>5 I don't recall. Shaun would probably know</p> <p>6 that.</p> <p>7 Q. Okay. Did the verification</p> <p>8 department hire new decision-makers or task</p> <p>9 different individuals with being</p> <p>10 decision-makers after Mr. Romeo gave his</p> <p>11 medical presentation?</p> <p>12 MR. JONES: Object to the form.</p> <p>13 A. I'm not sure I understand it,</p> <p>14 understand what you're asking, so...</p> <p>15 BY MR. ACKERMAN:</p> <p>16 Q. Mr. Romeo gave a medical</p> <p>17 presentation at some point in time following</p> <p>18 this meeting, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Subsequent to that</p> <p>21 presentation, were there additional people</p> <p>22 who became decision-makers?</p> <p>23 A. Yes.</p> <p>24 Q. Did those additional people who</p> <p>25 became decision-makers receive Mr. Romeo's</p>	<p style="text-align: right;">Page 216</p> 
<p style="text-align: right;">Page 215</p> <p>1 presentation?</p> <p>2 A. I believe so.</p> <p>3 Q. If you wanted to find out</p> <p>4 whether they had received it or not, how</p> <p>5 would you do that?</p> <p>6 A. I would confirm with Sergio in</p> <p>7 regulatory. Ken was part of the regulatory</p> <p>8 team.</p> <p>9 Q. Moving on to the next page,</p> <p>10 ends in 368.</p> <p>11 A. Uh-huh.</p> 	<p style="text-align: right;">Page 217</p> <p>1 BY MR. ACKERMAN:</p> <p>2 Q. Did you have any discussions</p> <p>3 with Ms. Matalon or Mr. Abreu regarding this?</p> <p>4 A. Yes.</p> <p>5 Q. What did you discuss with them?</p> <p>6 A. What did I discuss?</p> <p>7 Q. Yes.</p> <p>8 A. I don't recall exactly what we</p> <p>9 discussed.</p> <p>10 Q. Do you recall generally what</p> <p>11 you discussed?</p> <p>12 A. No. I know we reviewed this.</p> <p>13 We reviewed this in the meeting, but that's</p> <p>14 all I remember.</p> <p>15 Q. You reviewed the minutes?</p> <p>16 A. The minutes.</p> <p>17 Q. In a separate meeting with</p> <p>18 Ms. Matalon and Mr. Abreu?</p> <p>19 A. I don't recall if it was a</p> <p>20 separate meeting or one meeting with</p> <p>21 everybody, but there were -- I really don't</p> <p>22 recall it at all, to be honest with you.</p> 

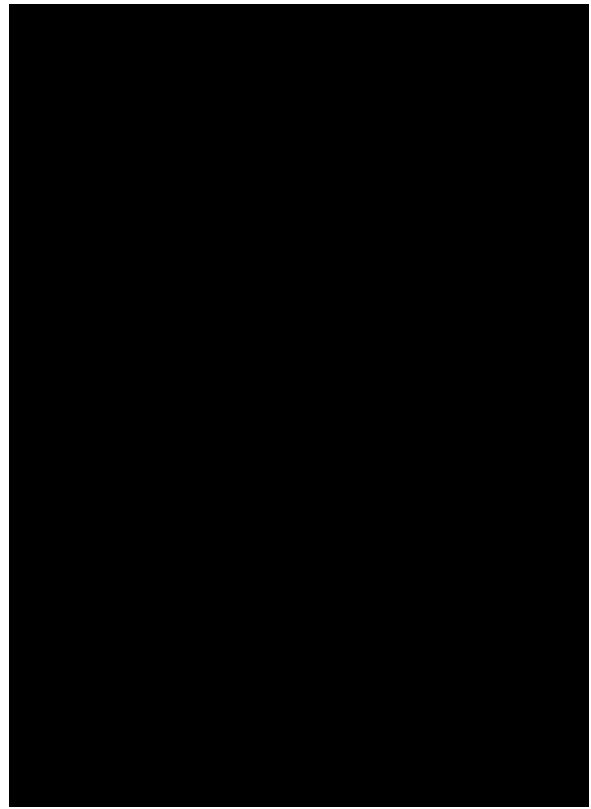
55 (Pages 214 to 217)

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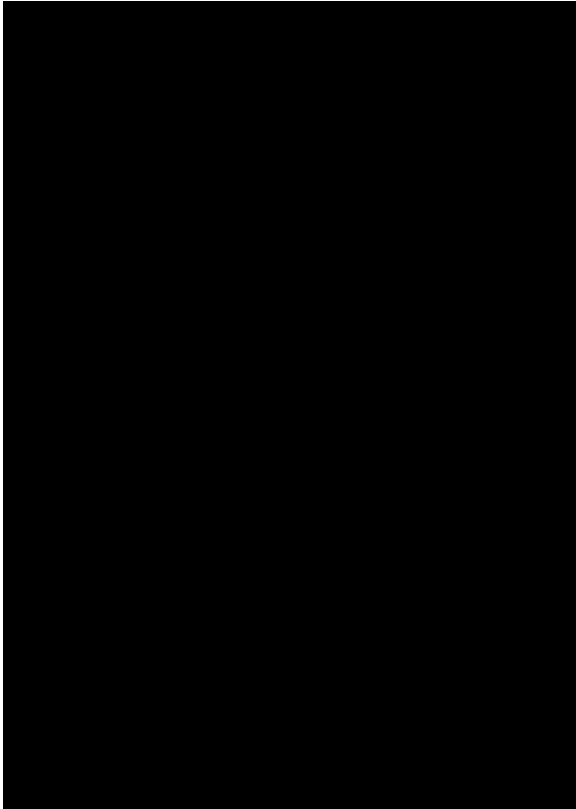
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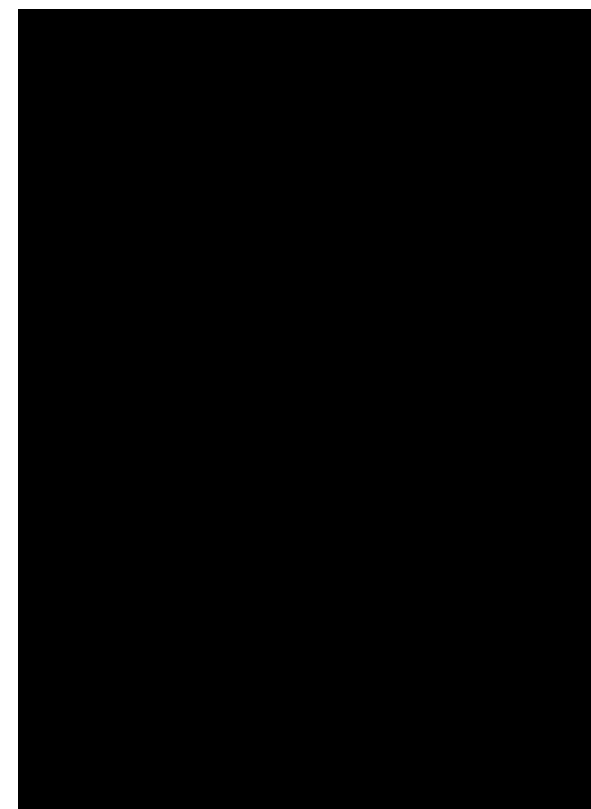
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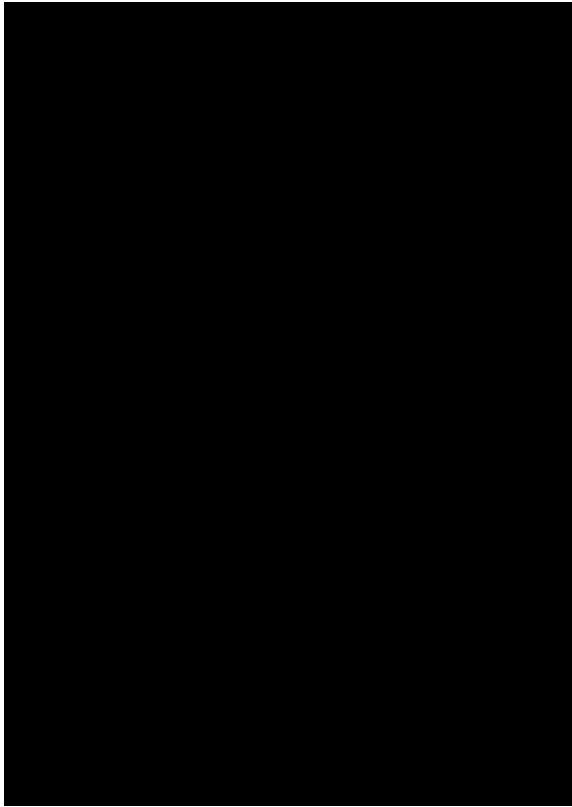
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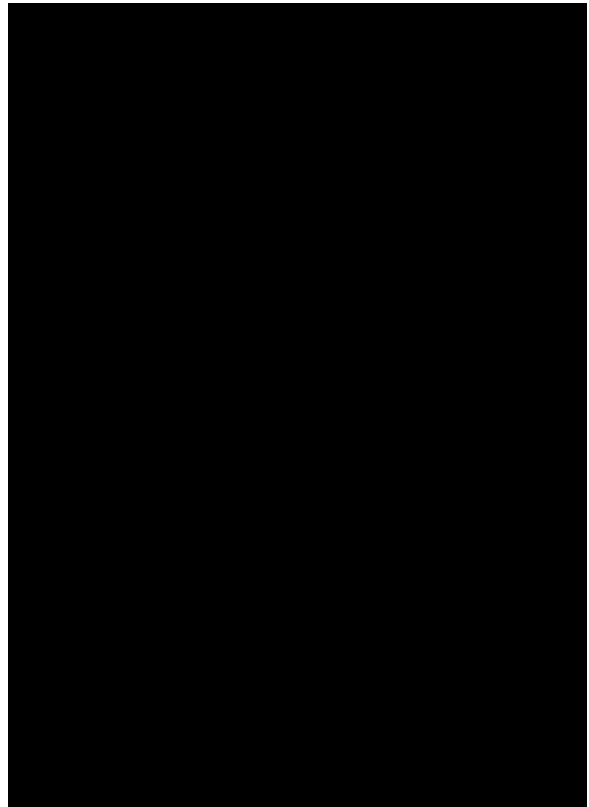
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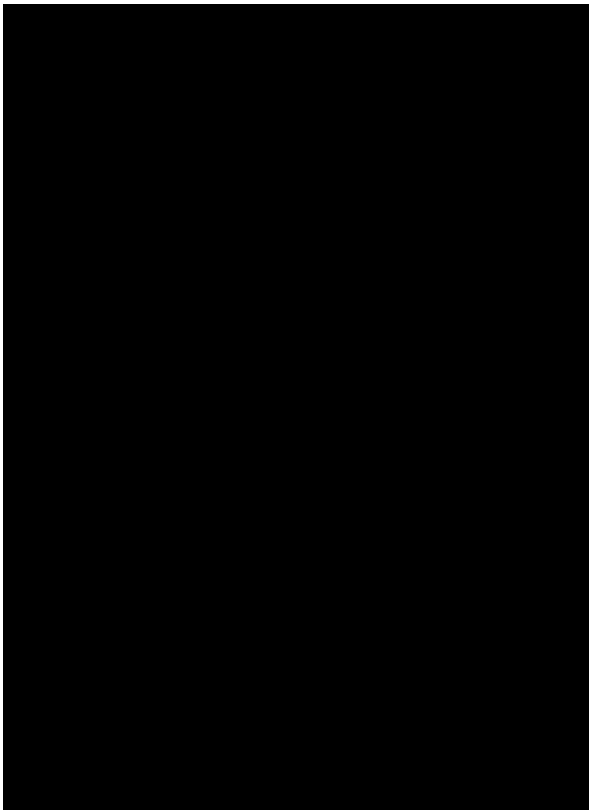
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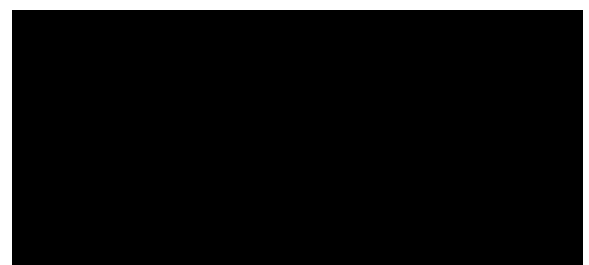
Page 224



Page 223



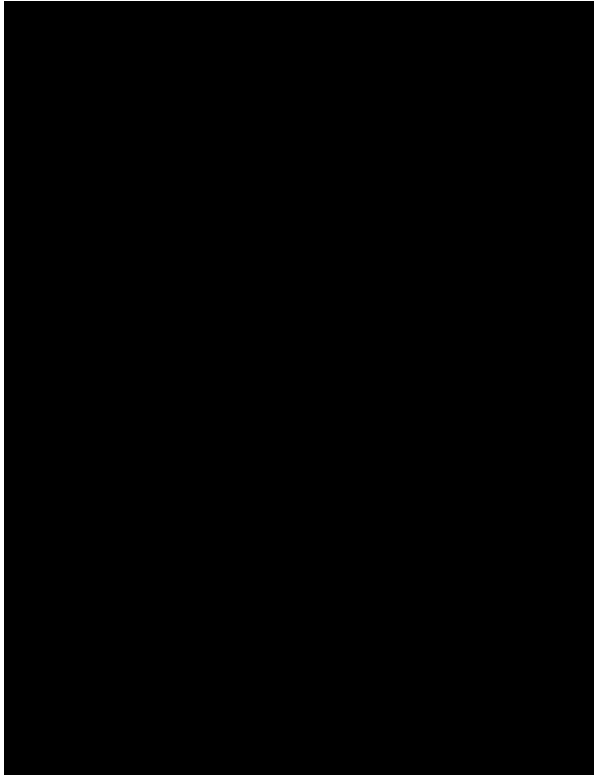
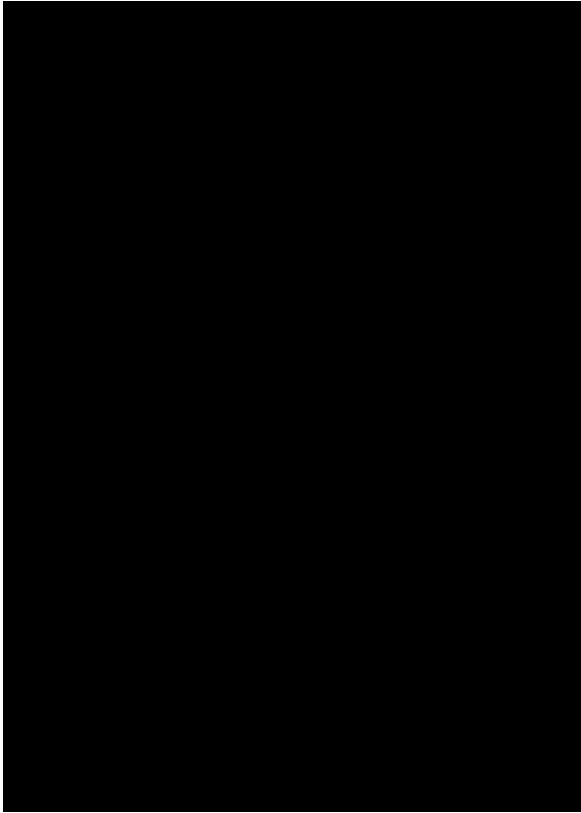
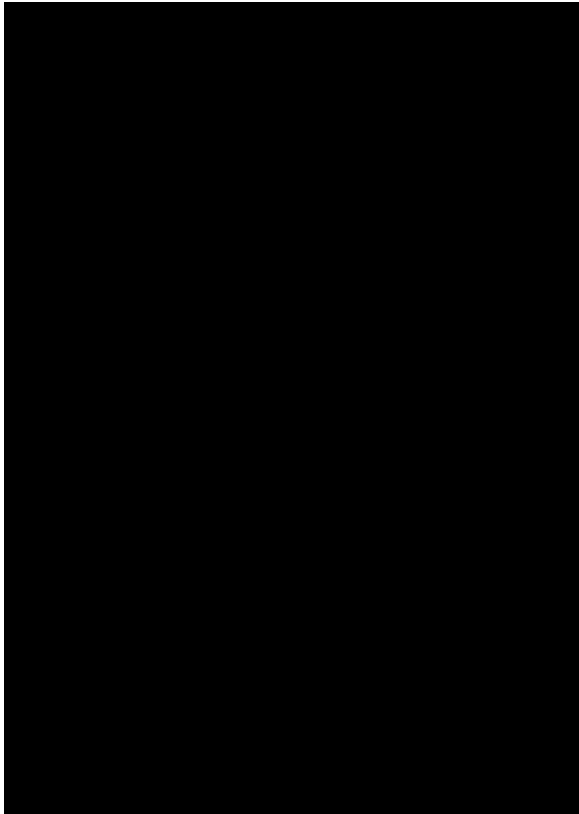
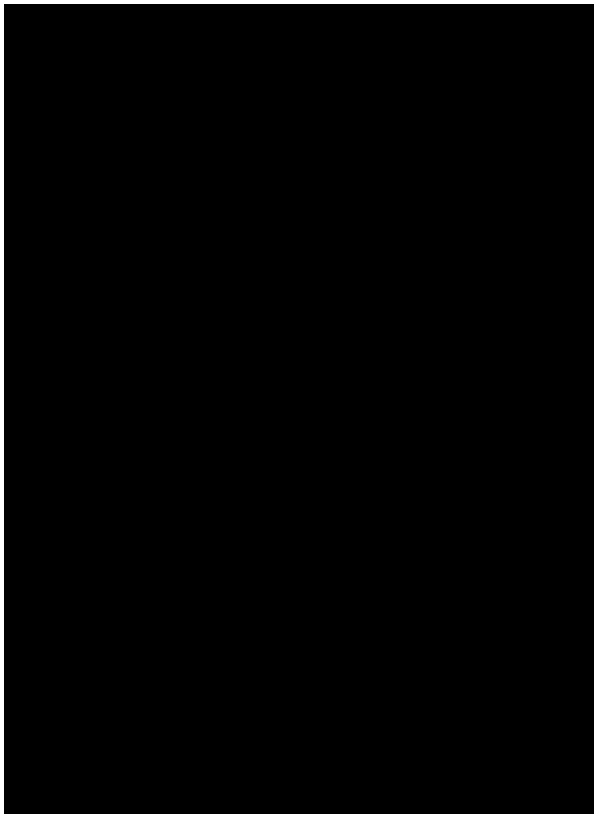
Page 225



9 MR. ACKERMAN: Good time for a
10 break?
11 MR. JONES: Sure.
12 THE VIDEOGRAPHER: The time is
13 now 3:22. Going off the record.
14 (Recess taken, 3:22?p.m. to
15 3:35?p.m.)
16 THE VIDEOGRAPHER: The time is
17 now 3:35, back on the record.
18 MR. ACKERMAN: We've got a few
19 more documents to go.
20 THE WITNESS: Sure.
21 MR. ACKERMAN: Let's mark this
22 as Exhibit 16.
23 (HenrySchein-Brandt Deposition
24 Exhibit 16 marked.)
25 ///

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<p>Page 226</p> <p>1 BY MR. ACKERMAN:</p> 	<p>Page 228</p> 
<p>Page 227</p> 	<p>Page 229</p> 

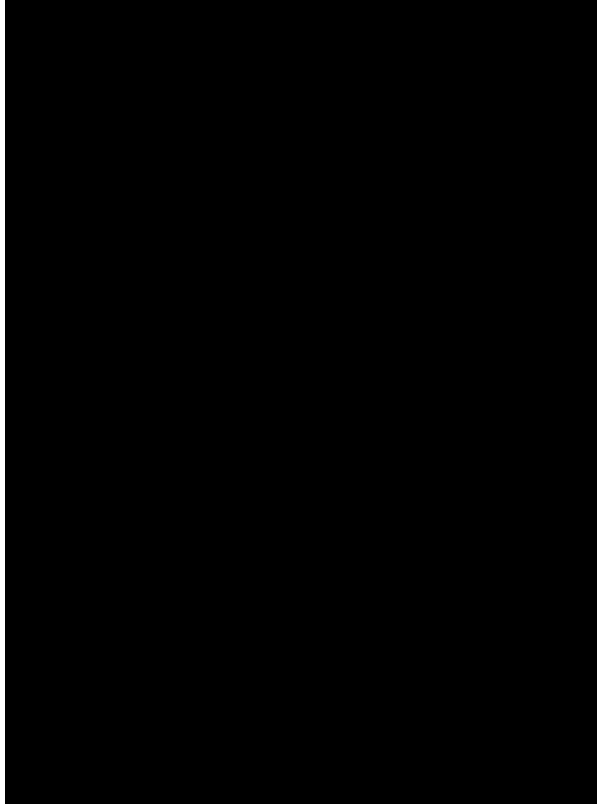
58 (Pages 226 to 229)

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Page 230



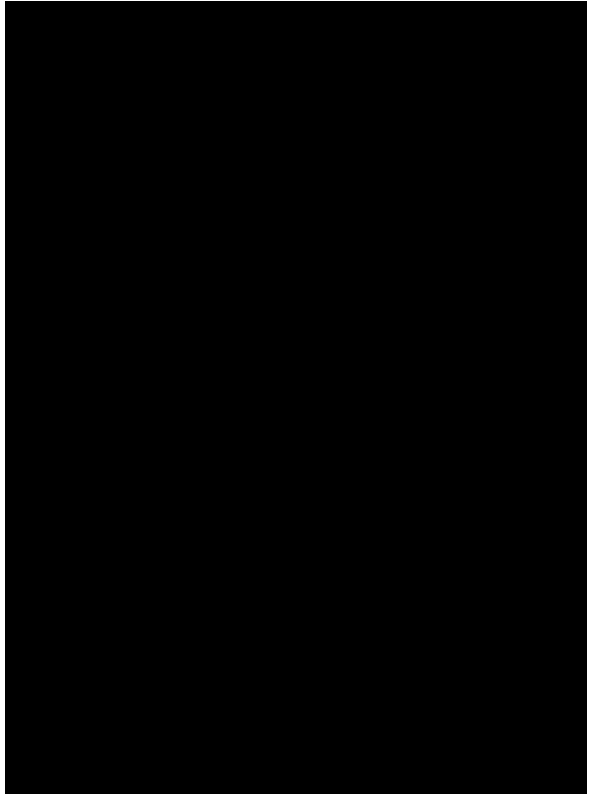
Page 232



Page 231



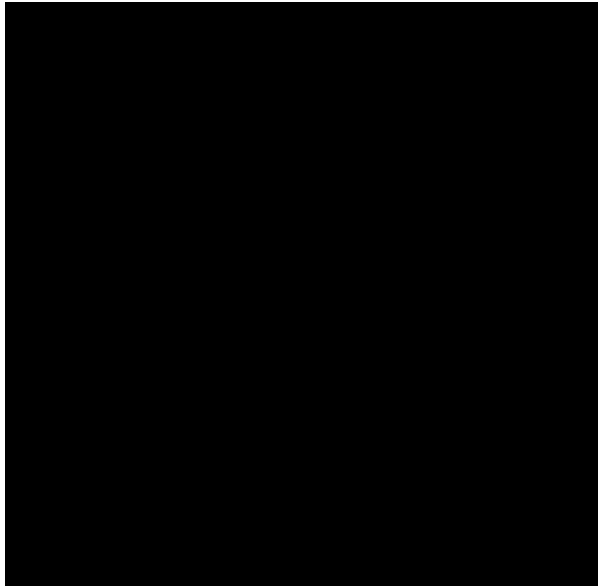
Page 233



59 (Pages 230 to 233)

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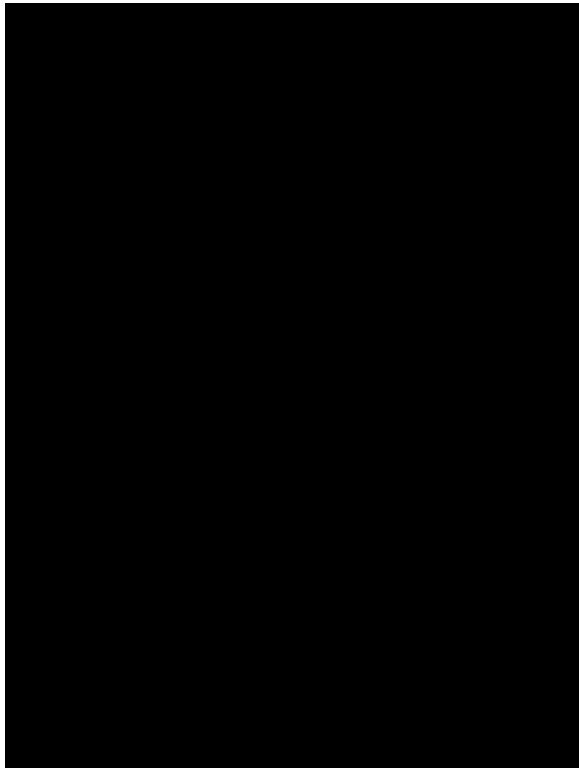
Page 234



19 MR. ACKERMAN: You can put that
20 one aside.
21 THE WITNESS: Okay.
22 MR. ACKERMAN: Let's mark this
23 as Exhibit 17.
24 (HenrySchein-Brandt Deposition
25 Exhibit 17 marked.)

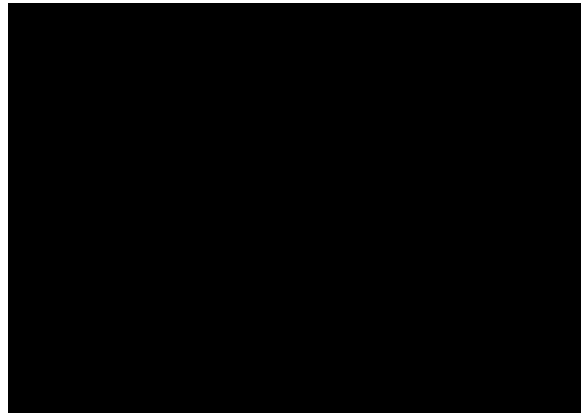
Page 235

1 BY MR. ACKERMAN:

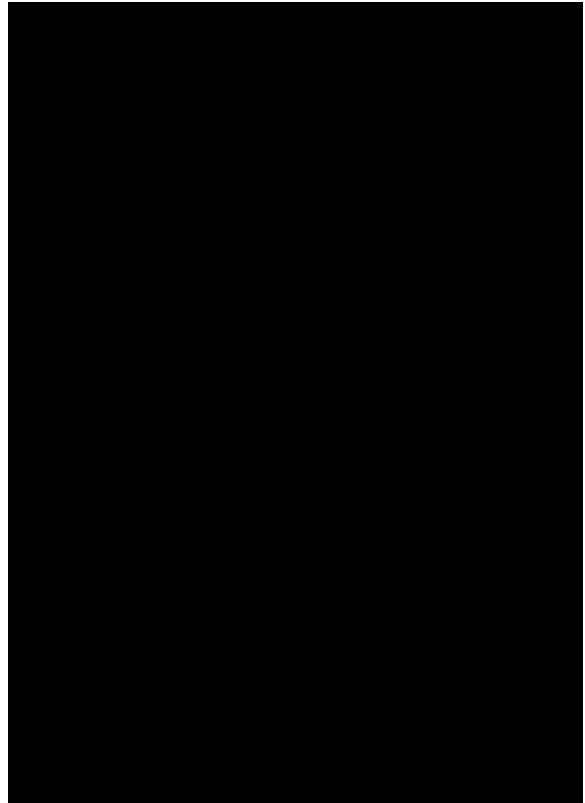


Page 236

2 Q. Who is Maggie Wilding?
3 A. Maggie Wilding is now
4 Maggie Koromi, she's the supervisor in Reno.
5 Q. In the verifications
6 department?
7 A. In the verifications
8 department.
9 Q. And who is or was
10 Judy LaBarbera?
11 A. She was the team leader in
12 Melville for verifications.



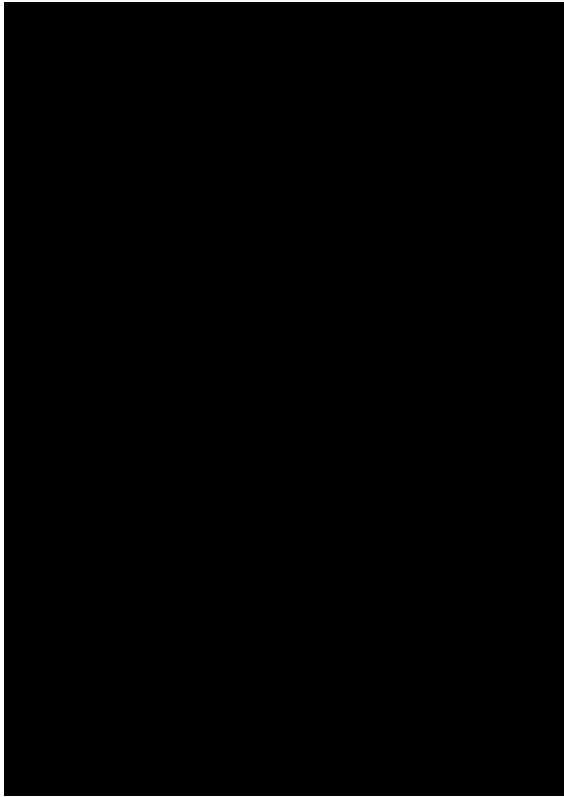
Page 237



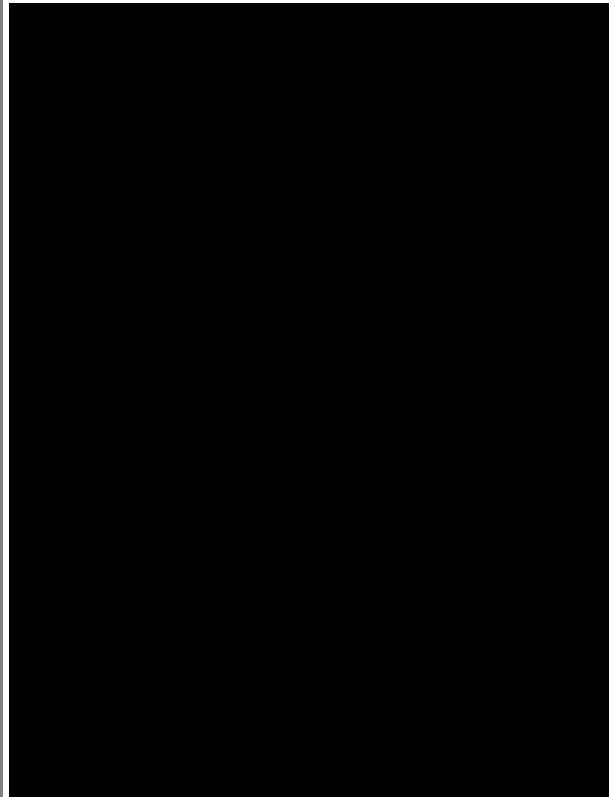
60 (Pages 234 to 237)

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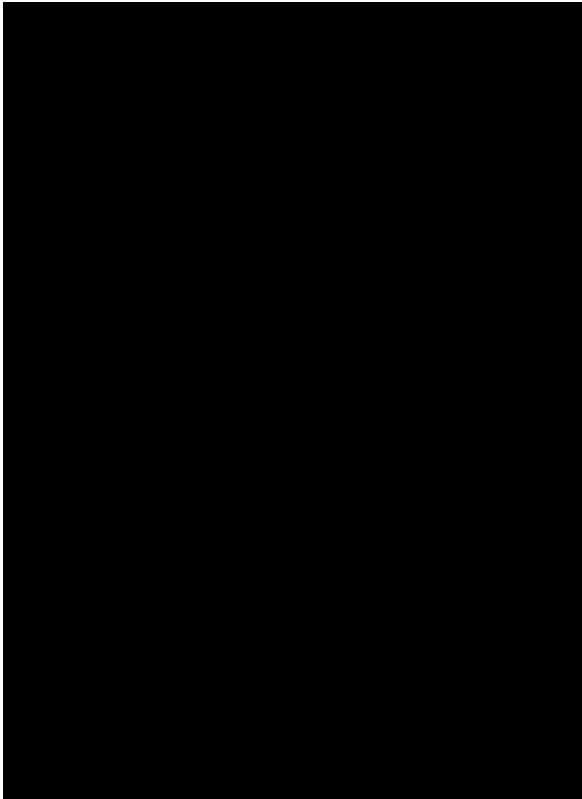
Page 238



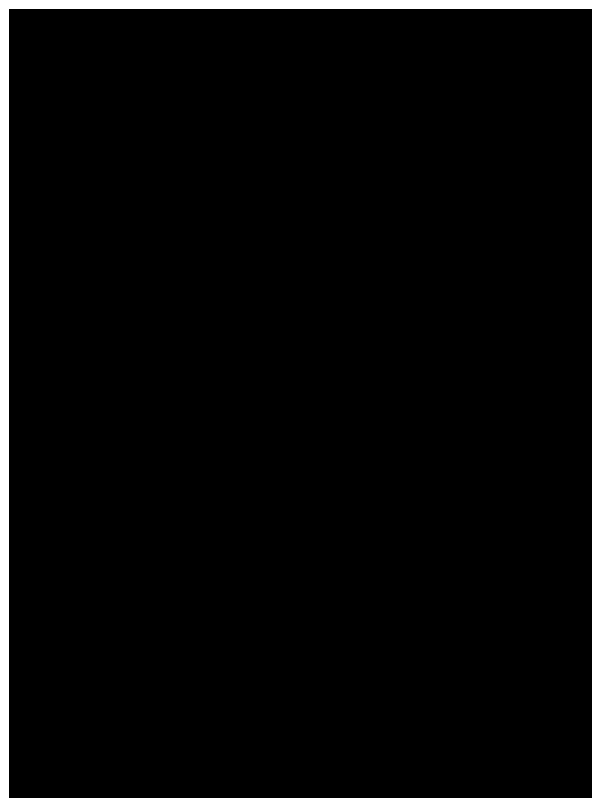
Page 240



Page 239



Page 241



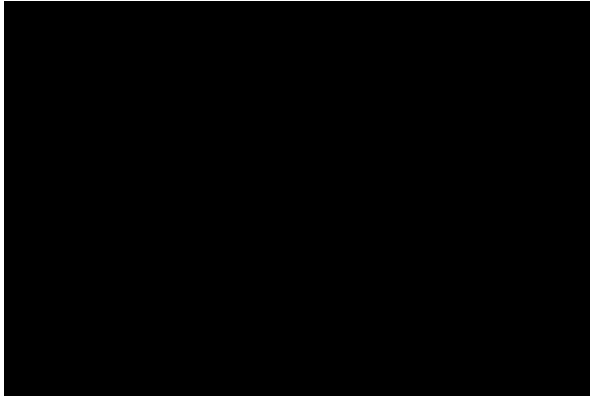
61 (Pages 238 to 241)

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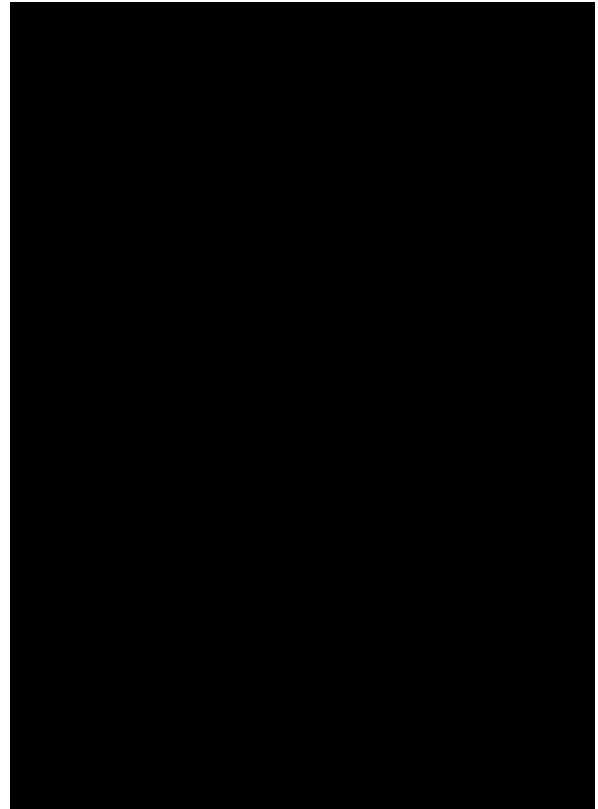
Page 242



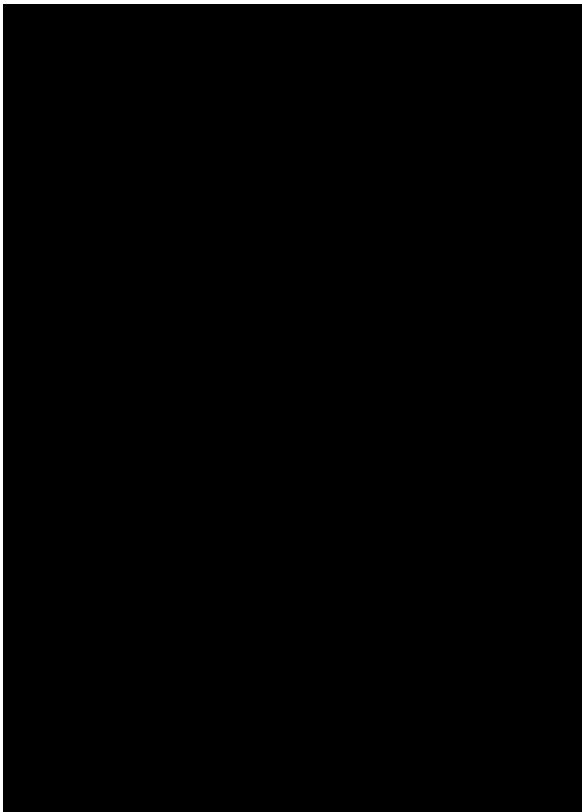
9 MR. ACKERMAN: Okay. Let's
10 mark this next one as Exhibit 19.
11 (HenrySchein-Brandt Deposition
12 Exhibit 19 marked.)
13 BY MR. ACKERMAN:



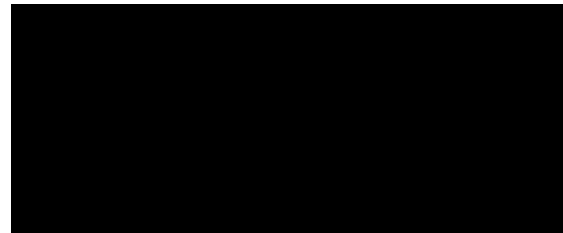
Page 244



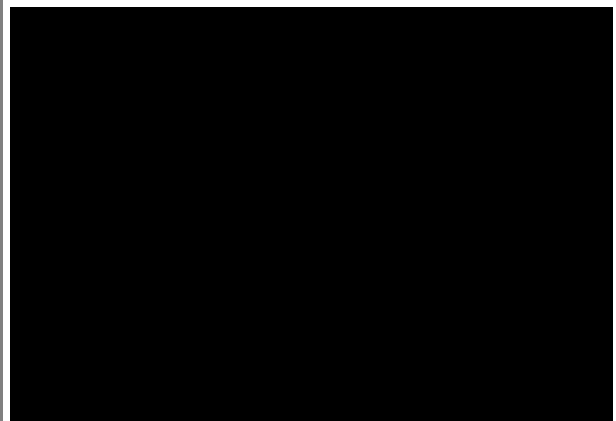
Page 243



Page 245



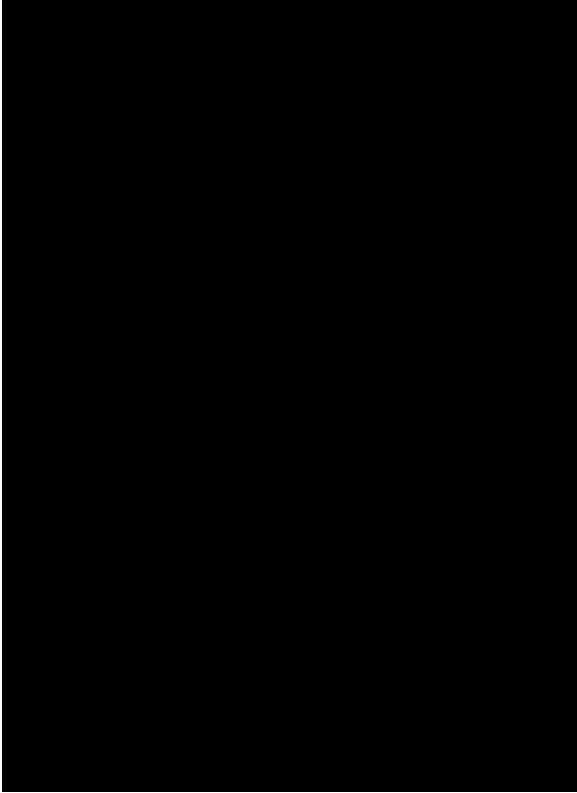
8 MR. ACKERMAN: Let's mark this
9 as Exhibit 20.
10 (HenrySchein-Brandt Deposition
11 Exhibit 20 marked.)
12 BY MR. ACKERMAN:



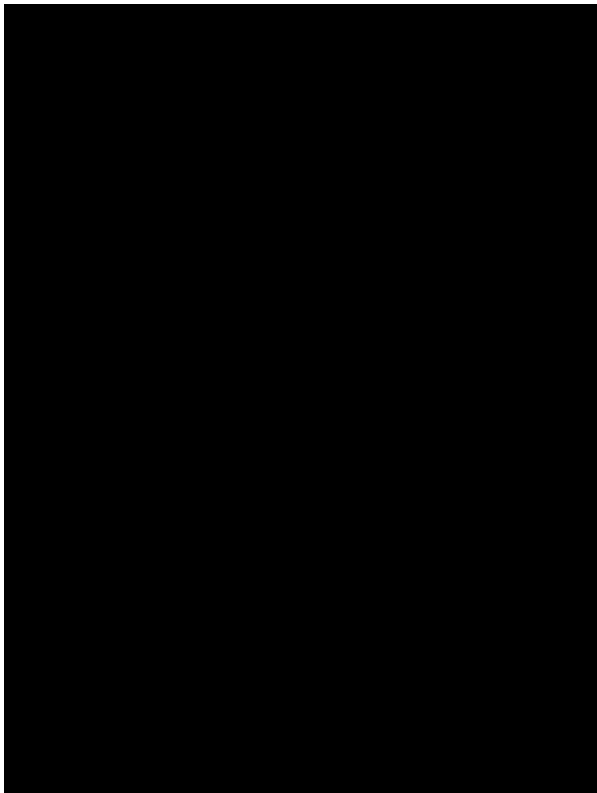
62 (Pages 242 to 245)

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Page 247



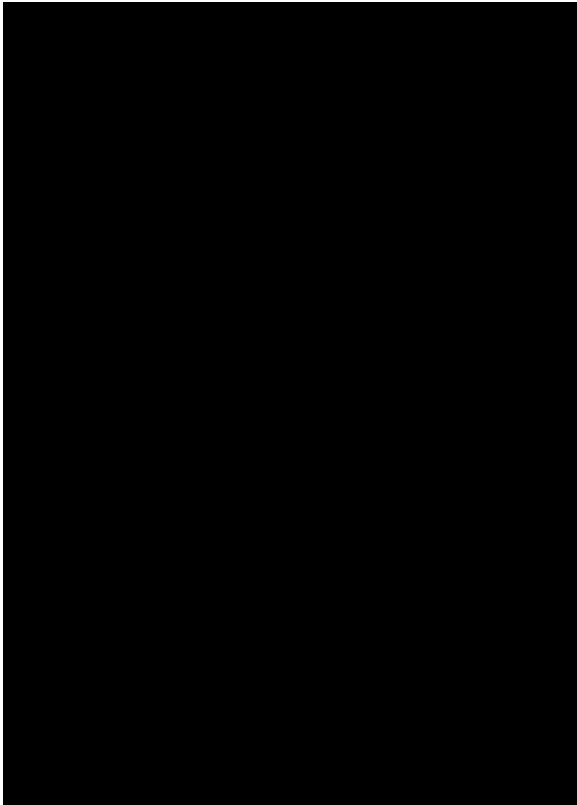
Page 249



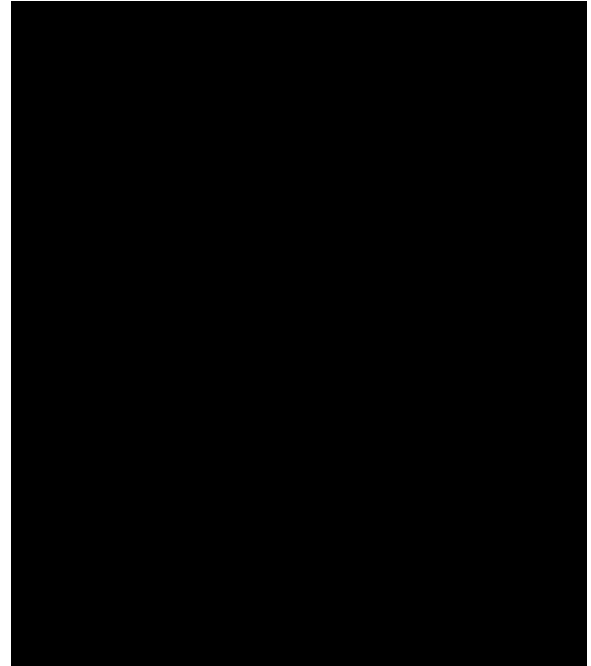
63 (Pages 246 to 249)

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Page 252



22 MR. ACKERMAN: Let's take a
23 break.

24 THE VIDEOGRAPHER: The time is
25 now 4:12, going off the record.

Page 251



Page 253

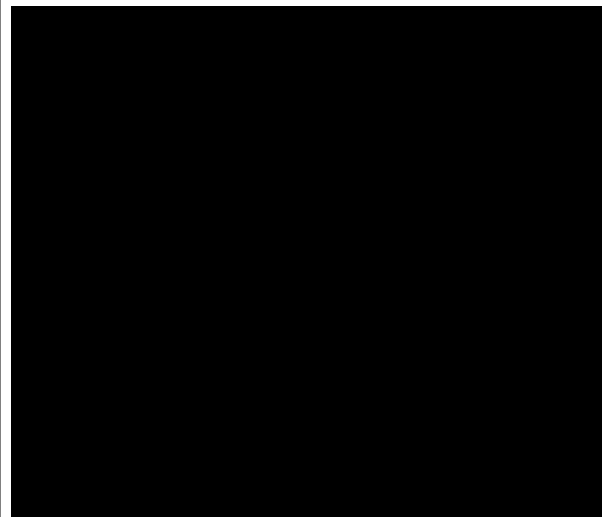
1 (Recess taken, 4:12?p.m. to
2 4:31?p.m.)

3 THE VIDEOGRAPHER: The time is
4 now 4:31. Back on the record.

5 MR. ACKERMAN: I believe this
6 is Exhibit 21.

7 (HenrySchein-Brandt Deposition
8 Exhibit 21 marked.)

9 BY MR. ACKERMAN:



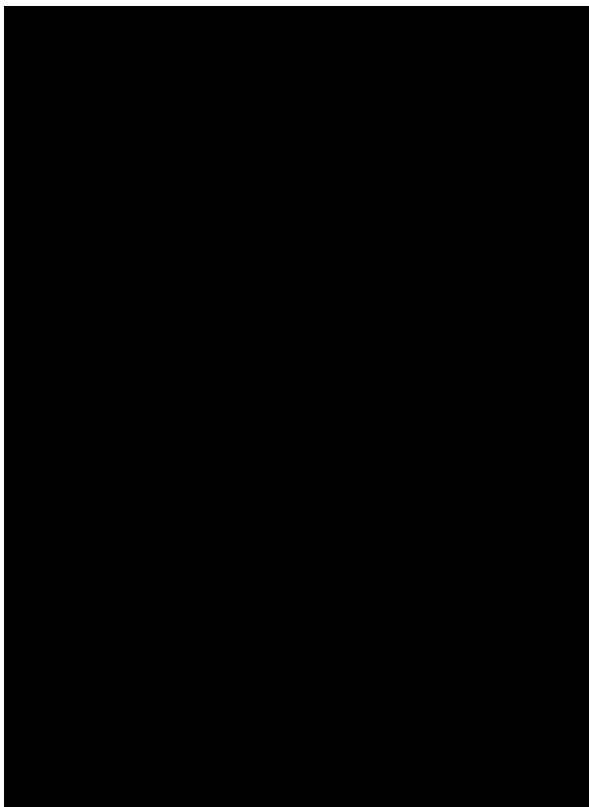
64 (Pages 250 to 253)

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Page 254

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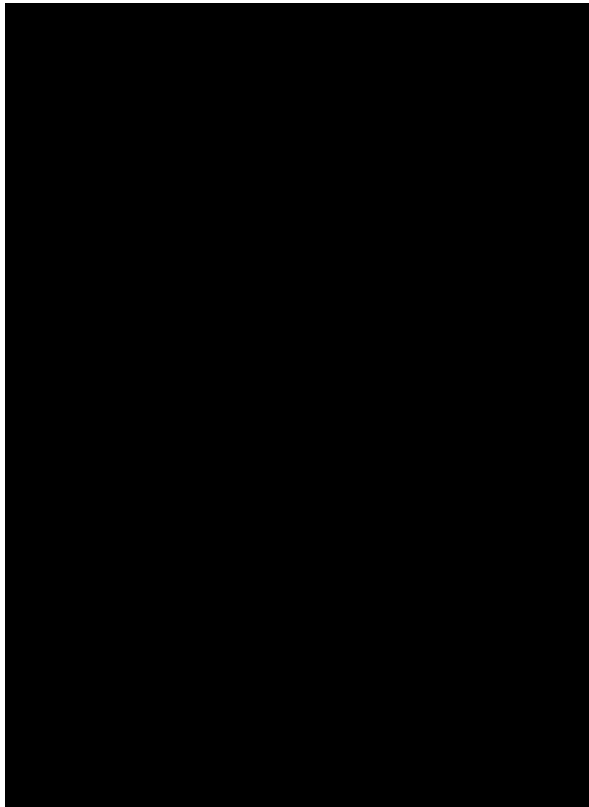
Page 256

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Page 255

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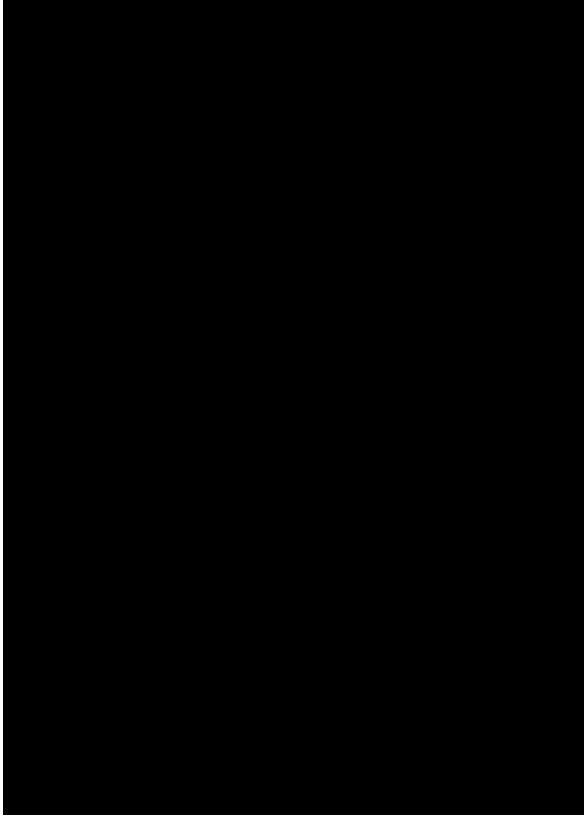
Page 257

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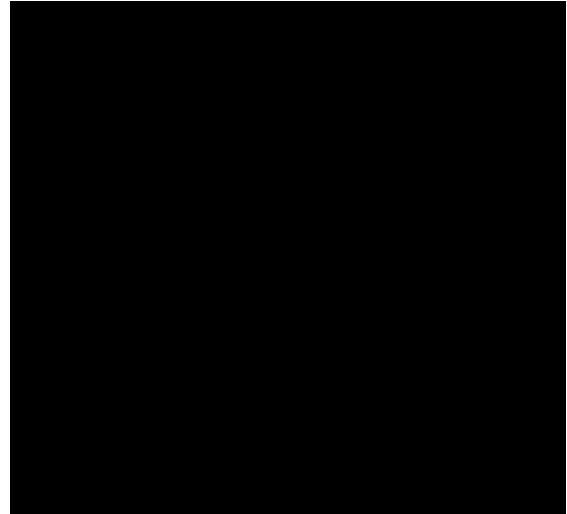
65 (Pages 254 to 257)

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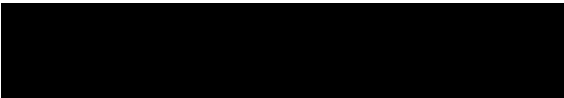
Page 260



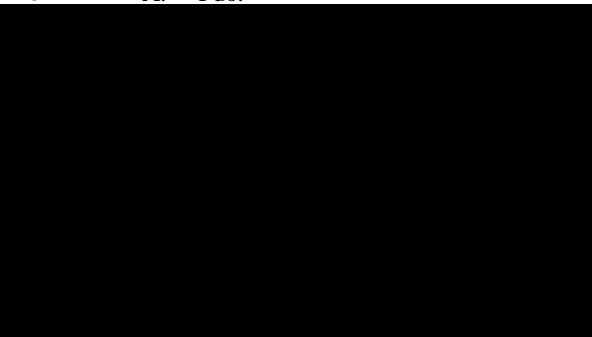
17 MR. JONES: Objection, form,
18 document speaks for itself.
19 BY MR. ACKERMAN:



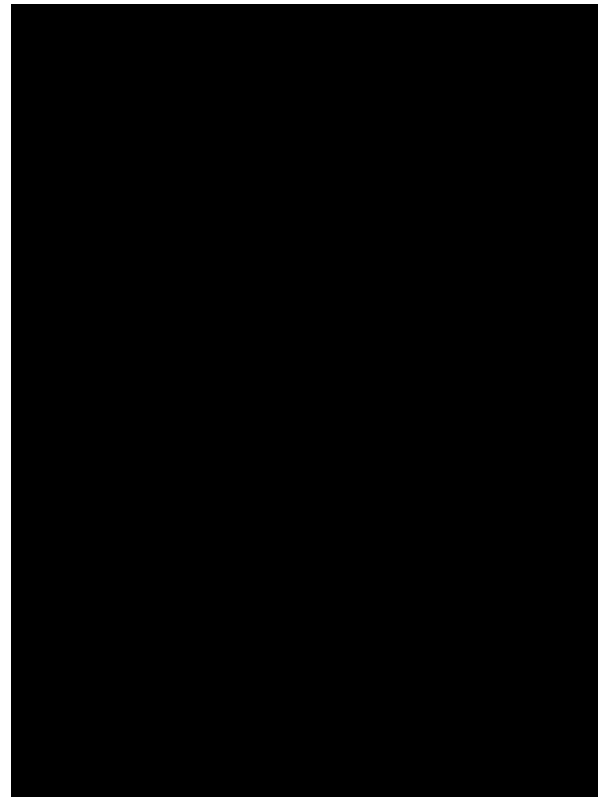
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4 Q. Okay. We can put that one
5 aside.
6 A. Okay.
7 Q. I want to just go through three
8 exhibits that we've already talked about.
9 A. Okay.
10 Q. Okay. And let's start with
11 Exhibit 16. Okay?
12 A. Uh-huh.
13 Q. Do you have that in front of
14 you?
15 A. I do.

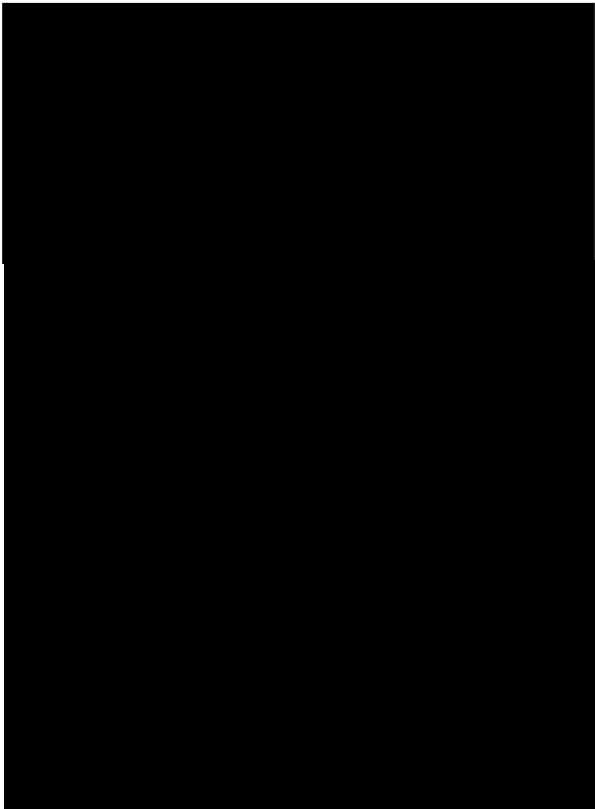



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66 (Pages 258 to 261)

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<p>Page 262</p> 	<p>Page 264</p> <p>1 MR. MENGIS: I'll reserve my 2 questions. 3 MR. JONES: We'll reserve our 4 questions. 5 MR. PERRY: Reserve. 6 THE VIDEOGRAPHER: The time is 7 now 4:45. This concludes the 8 deposition. Going off the record. 9 (Proceedings recessed at 10 4:45 p.m.) 11 --o0o-- 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>Page 263</p>  <p>24 MR. ACKERMAN: I have nothing 25 further.</p>	<p>Page 265</p> <p>1 CERTIFICATE 2 I, MICHAEL E. MILLER, Fellow of 3 the Academy of Professional Reporters, 4 Registered Diplomate Reporter, Certified 5 Realtime Reporter, Certified Court Reporter 6 and Notary Public, do hereby certify that 7 prior to the commencement of the examination, 8 BILL BRANDT was duly sworn by me to testify 9 to the truth, the whole truth and nothing but 10 the truth. 11 I DO FURTHER CERTIFY that the 12 foregoing is a verbatim transcript of the 13 testimony as taken stenographically by and 14 before me at the time, place and on the date 15 hereinbefore set forth, to the best of my 16 ability. 17 I DO FURTHER CERTIFY that pursuant 18 to FRCP Rule 30, signature of the witness was 19 requested by the witness or other party 20 before the conclusion of the deposition. 21 I DO FURTHER CERTIFY that I am 22 neither a relative nor employee nor attorney 23 nor counsel of any of the parties to this 24 action, and that I am neither a relative nor 25 employee of such attorney or counsel, and 26 that I am not financially interested in the 27 action. 28 29 MICHAEL E. MILLER, FAPR, RDR, CRR 30 Fellow of the Academy of Professional Reporters 31 NCRA Registered Diplomate Reporter 32 NCRA Certified Realtime Reporter 33 Certified Court Reporter 34 35 Notary Public in and for the 36 State of Texas 37 My Commission Expires: 7/9/2020 38 39 Dated: 19th day of February, 2019 40 41 42 43 44 45</p>

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<p style="text-align: right;">Page 266</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the</p> <p>6 appropriate space on the errata sheet for any</p> <p>7 corrections that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it.</p> <p>10 You are signing same subject to</p> <p>11 the changes you have noted on the errata</p> <p>12 sheet, which will be attached to your</p> <p>13 deposition.</p> <p>14 It is imperative that you return</p> <p>15 the original errata sheet to the deposing</p> <p>16 attorney within thirty (30) days of receipt</p> <p>17 of the deposition transcript by you. If you</p> <p>18 fail to do so, the deposition transcript may</p> <p>19 be deemed to be accurate and may be used in</p> <p>20 court.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 268</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2</p> <p>3</p> <p>4 I, BILL BRANDT, do hereby certify</p> <p>5 that I have read the foregoing pages and that</p> <p>6 the same is a correct transcription of the</p> <p>7 answers given by me to the questions therein</p> <p>8 propounded, except for the corrections or</p> <p>9 changes in form or substance, if any, noted</p> <p>10 in the attached</p> <p>11 Errata Sheet.</p> <p>12</p> <p>13 _____</p> <p>14 BILL BRANDT DATE</p> <p>15</p> <p>16 Subscribed and sworn to before me this</p> <p>17 _____ day of _____, 20 ____.</p> <p>18 My commission expires: _____</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 267</p> <p>1 ERRATA</p> <p>2 PAGE LINE CHANGE</p> <p>3 _____</p> <p>4 REASON: _____</p> <p>5 _____</p> <p>6 REASON: _____</p> <p>7 _____</p> <p>8 REASON: _____</p> <p>9 _____</p> <p>10 REASON: _____</p> <p>11 _____</p> <p>12 REASON: _____</p> <p>13 _____</p> <p>14 REASON: _____</p> <p>15 _____</p> <p>16 REASON: _____</p> <p>17 _____</p> <p>18 REASON: _____</p> <p>19 _____</p> <p>20 REASON: _____</p> <p>21 _____</p> <p>22 REASON: _____</p> <p>23 _____</p> <p>24 REASON: _____</p> <p>25</p>	<p style="text-align: right;">Page 269</p> <p>1 LAWYER'S NOTES</p> <p>2</p> <p>3 PAGE LINE</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25</p>

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